## EXHIBIT C

United States v. Yanping Wang, Case No.: S1 23-CR-118 (AT)

SUPREME COURT OF THE STATE OF NEW YORK COUNTY OF NEW YORK

YANPING WANG a/k/a YVETTE WANG,

Plaintiff,

v.

XIANMIN XIONG a/k/a XI NUO a/k/a SINO, XIA YELIANG, LI HONGKUAN, and GAO BINGCHEN a/k/a HUANG HEBIAN,

Defendants.

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VERIFIED AMENDED **COMPLAINT** 

Plaintiff Yanping Wang a/k/a Yvette Wang (hereinafter "Plaintiff"), for her amended complaint against defendants Xianmin Xiong a/k/a Xi Nuo a/k/a Sino, Xia Yeliang, Li Hongkuan, and Gao Bingchen a/k/a Huang Hebian (hereinafter "Defendants"), by undersigned her counsel, states the following:

#### INTRODUCTION

- 1. This action is brought to redress Defendants' ongoing conspiracy and campaign of defamation, harassment and tortious interference with contract and business relations directed against the Plaintiff. As explained below, this coordinated campaign against Plaintiff – an innocent woman – includes grotesque public postings that are misogynous and violent in nature, and which were maliciously aimed not only at utterly destroying Plaintiff's reputation and business, but to degrade Plaintiff and put her in fear of bodily harm.
- In fact, Defendants' ongoing coordinated campaign of threats, defamation and 2. harassment directed to the Plaintiff has now escalated, culminating in Defendant Xianmin Xiong ("Xiong") approaching the Plaintiff and threatening to kill her. Indeed, after Defendant Xiong's recent death threat to the Plaintiff, he continues to stalk Plaintiff directly outside her place of work.

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3. By this action, Plaintiff seeks, among other things, compensatory and punitive damages, and an order enjoining Defendants from continuing their malicious and relentless campaign of defamation, harassment and tortious interference of business relations.

4. As explained below, the Defendants have acted in concert, and coordinated their defamatory public postings regarding the Plaintiff, in order to maximize the damage of their public defamation campaign of the Plaintiff.

#### PARTIES AND JURISDICTION

- 5. Plaintiff is a female individual, who was at all times relevant hereto an adult resident of New York County, in the State of New York.
- 6. Defendant Xianmin Xiong is a male individual, who, upon information and belief, was at all times relevant hereto an adult resident of the State of New York.
- 7. Defendant Xia Yeliang is a male individual, who, upon information and belief, is and was at all times relevant hereto an adult resident of the Commonwealth of Virginia.
- 8. Defendant Li Hongkuan is a male individual, who, upon information and belief, is and was at all times relevant hereto an adult resident of the State of Maryland.
- 9. Defendant Gao Bingchen is a male individual, who, upon information and belief, is and was at all times relevant hereto an adult resident of the Canadian province of British Columbia.
  - 10. Venue is proper as Plaintiff resides in New York County (CPLR 503(a)).

#### **BACKGROUND**

#### The Defendants Acted in Furtherance of a Conspiracy

11. Defendants Xiong, Yeliang, Hongkuan and Bingchen acted in concert and pursuant to a conspiracy to harass and intimidate the Plaintiff, and to destroy Plaintiff's reputation and her business.

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12. In or around August of 2017, Defendants formed an agreement to take, and maliciously and intentionally carried out, overt acts in furtherance of their conspiracy and agreement to destroy the Plaintiff's reputation and business.

13. As detailed below, Defendants Xiong, Yeliang, Hongkuan and Bingchen acted in concert and pursuant to this agreement to publicly disseminate the same false and derogatory information about the Plaintiff: namely, that the Plaintiff was engaged in an extramarital sexual affair with her work colleague; that Plaintiff is a rape victim; that Plaintiff engaged in illegal conduct by intimidating a witness and forging documents relevant to legal proceedings; and that Plaintiff was complicit in the wrongful interrogation of a witness to a legal proceeding.

14. Pursuant to their agreement, the Defendants committed the following overt acts as detailed below: they made very similar false statements regarding the Plaintiff on their Twitter accounts, and agreed to coordinate the timing of the publication of these false statements to maximize the harm to Plaintiff's reputation and business. Indeed, the similarity of these false statements, and the fact that they were made during the same time period regarding a private figure is strong evidence that a conspiracy existed among the Defendants.

15. In addition, the Defendants agreed to commit other overt acts in furtherance of their conspiracy to threaten, harass and intimidate the Plaintiff where she works and lives in New York. As part of their conspiracy, and as set forth below, the Defendants agreed that Defendant Xiong would confront the Plaintiff in person, and place her in fear of bodily harm. In furtherance of the Defendants' agreement, as detailed below, Defendant Xiong committed multiple overt acts: he issued an in-person death threat to the Plaintiff in a New York courthouse, and then over the span of weeks, appeared directly outside her place of work in New York to harass her and place her in fear of bodily harm.

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16. As a direct and proximate result of the Defendants' conspiracy and their overt acts

in furtherance of their conspiracy, the Plaintiff has suffered damages as set forth in this Amended

Complaint, including being placed in imminent fear of bodily harm, and severe financial hardship

and damages to her business.

**Defendant Xianmin Xiong's Ongoing Defamation and Harassment of the Plaintiff** 

**Background of the Harassment Campaign** 

17. As part of the Defendants' conspiracy, Defendant Xiong has been engaged in an

extensive malicious campaign to destroy the reputation of Plaintiff, by making what are completely

baseless and false purported statements of fact about the Plaintiff which have no basis in fact.

Defendant Xiong acted in concert with the other defendants, who all coordinated their defamation

campaign in order to maximize the damage to Plaintiff's reputation.

18. Defendant Xiong's campaign to terrorize Plaintiff began with his repeated and

malicious posting of false and defamatory material on online social media platforms regarding the

Plaintiff. As detailed below, these defamatory posts include the blatantly false allegations that:

Plaintiff, who is a married woman, is involved in an extra-marital sexual relationship with another

man; that Plaintiff has supposedly been raped by a work colleague; that Plaintiff has destroyed

evidence relevant to a legal proceeding; and that Plaintiff has engaged in wrongful interrogation

and detention of an alleged witness in a legal proceeding. Defendant Xiong made all of these false

allegations knowing they were false, and with the malicious intent to destroy Plaintiff's reputation

and career, and instill terror in her on a daily basis.

19. These defamatory statements are particularly egregious because Plaintiff is not a

public figure, and is instead an innocent woman – a wife and mother – who is a private individual

working for a private company.

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20. Defendant Xiong's campaign against Plaintiff is persistent and continuing. For

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example, on August 26, 2017, Defendant Xiong posted on his Twitter account to his approximately

31,500 followers that Plaintiff, referred to as "Sister Yanping," had an intimate relationship with

a man named "Robert." Specifically, Defendant Xiong tweeted the following defamatory

statement: "Robert has an intimate relationship with Sister Yanping. He doesn't have a decent

stance but only cares about the money." A full and correct copy of the tweet and a certified

translation is attached hereto as Exhibit A.

21. The above defamatory tweet conveys a false statement of fact to the public

regarding Plaintiff, namely, that Plaintiff – a married woman – is having an extramarital intimate

relationship with a man named Robert.

22. Subsequently, on September 5, 2017, Defendant Xiong posted another outrageous

and defamatory comment regarding Plaintiff, this time purporting to quote a fake interview that

Defendant Xiong falsely claims that Plaintiff gave about her relationship with her male work

colleague, Guo Wengui ("Guo"). Specifically, Defendant Xiong tweeted that:

Wang Yanping denied today that the recording of her having sex with Guo Wengui published on Twitter was true. She even totally denied the recorded conversation between her and Ma Rui was true. She did not comment at all on the alleged rape Guo Wengui involved.

A full and correct copy of the tweet and a certified translation is attached hereto as Exhibit B.

23. The above statements by Defendant Xiong again convey false and defamatory

statements of fact to the public regarding Plaintiff. Specifically, Defendant Xiong falsely alleges

that Plaintiff had sex with a man other than her husband, and that Plaintiff is complicit in the rape

of another woman.

24. The next day, on September 6, 2017, Defendant Xiong again posted a defamatory

tweet about Plaintiff. In this post, Defendant Xiong presented a fake dialogue between Plaintiff

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(referred to as "Yan") and another woman (referred to as "Ma"). This phony dialogue conveys to the public that the Plaintiff helped intimidate Ma Rui and participated in the intimidation of a witness to a crime. Specifically, Defendant Xiong tweeted the following:

Yan: I love sister Ma very much, she is a very innocent kid.

Ma: You helped bad people to victimize the weak and detained me in the apartment.

Yan: She is introverted and may suffer depression.

Ma: You grabbed my cellphone and forced me not to call the police.

Yan: All the so-called conversation recordings between Wang Yanping and Ma Rui on the internet are fake.

Ma: You may think that you can deceive some people, and you can deceive them for some period of time, but you will never be able to deceive everyone forever.

A full and correct copy of the tweet and a certified translation of its text is attached hereto as Exhibit A.

- 25. The above tweet makes a false and defamatory statement of fact to the public regarding Plaintiff. Specifically, it accuses Plaintiff of illegally detaining and threatening another woman, and conveys to the public that Plaintiff is lying about her involvement in these illegal actions.
- 26. Approximately one month later, on October 12, 2017, Defendant Xiong again posted another defamatory tweet regarding the Plaintiff. Specifically, Defendant Xiong tweeted:

Wang Yanping: You have to think clearly. The case of Ma Rui is going to be a criminal case. You definitely will become one of the defendants, because you are suspected of assisting Guo Wengui in destroying the forensic evidence. You should first sue Guo Wengui for sexual assault at this critical moment, after all it is the truth. You have been terribly deceived by Guo Wengui-- you cannot go back home and you have been separated from your child and husband out of your choice. Once you are sued in court, it will be very hard to turn things around. Be smart and sue Guo Wengui immediately to turn the table around and take the situation under your control.

A full and correct copy of the tweet and a certified translation is attached hereto as Exhibit A.

27. The above defamatory tweet conveys false statements of fact to the public regarding Plaintiff, that is, that Plaintiff has assisted in destroying evidence relevant to a crime, that Plaintiff was sexually assaulted, and that Plaintiff allows herself to be sexually assaulted.

- 28. The above defamatory statements which are false and have no basis in fact were made by Defendant Xiong with malice and knowledge of their falsity could only be said with the intent to cause the direct and proximate harm of ruining Plaintiff's reputation, her business relationships, and her relationship with her husband.
- 29. Defendant Xiong's campaign to terrorize the Plaintiff has not only continued, but has increased in its ferocity and plain intent to completely destroy Plaintiff's family life and career. As part of this campaign to destroy the Plaintiff's life, Defendant Xiong embarked on the below series of internet postings, all aimed to destroy the Plaintiff's reputation and isolate her from her family.
- 30. On January 18, 2019, Defendant Xiong posted a tweet falsely accusing Plaintiff of plagiarizing the signature of her work colleague Guo. Specifically, Defendant Xiong's tweet stated that:

It has been learned that the counsel Daniel Watt who is retained by Guo Wengui for a lawsuit against Xia Yeliang and Li Hongkuan has already applied for withdrawal. What is surprising is that in <u>Guo Wengui's confirmation letter that Daniel submitted to the court is actually signed in Yanping's handwriting</u>. [emphasis added]

A full and correct copy of the tweet and a certified translation is attached hereto as Exhibit C.

- 31. The above defamatory tweet by Defendant Xiong conveys a false and defamatory statement of fact to the public regarding Plaintiff. Specifically, the tweet falsely conveys that Plaintiff has illegally fabricated evidence relevant to a legal proceeding.
- 32. On April 26, 2019, a YouTube video was uploaded in which Defendant Xiong discussed Ms. Wang's testimony in a trial. Specifically, Defendant Xiong states that:

So I will tell you guys about the situation of the trial this morning. There were three witnesses being examined in the morning and the first one who testified was Wang Yanping....The counsel then asked her if she knew about the purchase of this building by XXX, the off-shore company. She replied she didn't know. Yet, the counsel held a pile of papers and said, "You signed all these papers, but you knew nothing about these?" She then stammered and said she was super nervous, she had already forgotten these matters and please pardon her. So, it was obvious that she had lied on these matters. [emphasis added]

A true and correct copy of the relevant excerpts of the transcript of the YouTube video and a certified translation are attached hereto as Exhibit B.

- 33. Defendant Xiong's description of Plaintiff's testimony as quoted above is false and clearly conveys a defamatory statement of purported fact to the public regarding Plaintiff, specifically, that Plaintiff has illegally provided false testimony under oath.
- 34. Two days later, on April 28, 2019, Defendant Xiong posted yet another defamatory tweet about the Plaintiff. In this new tweet, Defendant Xiong falsely alleges that Plaintiff has knowledge of a sexual assault which she is not reporting. Specifically, Defendant Xiong tweeted that:

If Wang Yanping wants to save her own ass, the only way is to file a report in the police station, accusing someone for sexual assault. The evidence is very easy and simple, there are a lot of audio clips online. If she still cares about losing her face in public at this point, she is too stupid. [emphasis added]

A full and correct copy of the tweet and a certified translation is attached hereto as Exhibit C.

35. Two weeks later, on May 12, 2019, Defendant Xiong again falsely tweeted about Plaintiff's alleged failure to report a sexual assault, specifically tweeting:

I told Wang Yanping that you have no future if you follow Guo Wengui. Guo never has any loyalty to his friends. He uses people when they have value to him and he throws them away like a piece of cleaning shred if they have lost their value to him. I hope that she can report to the NYPD accusing Guo Wengui raping and assaulting her. This action will turn her situation from losing to winning [emphasis added]

A full and correct copy of the tweet and a certified translation is attached hereto as Exhibit C.

36. On that same day, May 12, 2019, Defendant Xiong also tweeted that:

There was an occasion where Guo Wengui assaulted Wang Yanping after he got drunk. Not only did he rape Wang, he also stepped on her belly violently. There was a recording of this audio clip online. It seems that Wa Li was there at that time too. [emphasis added]

A full and correct copy of the tweet and translation is attached hereto as Exhibit C.

- 37. The above-quoted three tweets clearly convey false and defamatory statements of fact to the public regarding the Plaintiff. Specifically, the tweets falsely convey that Plaintiff is a rape victim, and that Plaintiff is having sex with another man, despite being married. The tweets also falsely convey that Plaintiff is obstructing justice by not reporting crimes of which she is supposedly aware.
- 38. On June 7, 2019, Defendant Xiong posted yet another tweet, in which he falsely accused Plaintiff of "interrogating" Ma Rui. Specifically, Defendant Xiong tweeted that:

Since the exposure of the audio clip about Guo Wengui and his secretary Wang Yanping interrogating Ma Rui together, Ms. Wang accepted the interview from Der Spiegel, leaving recorded proof of her voice. After verification from the Australian judicial authorities, the audio clip of Wang Yanping having an interview with Der Spiegel is the same as the audio clip of her interrogating Ma Rui. This evidence has already been submitted to the court. [emphasis added]

A full and correct copy of the tweet and translation is attached hereto as Exhibit C.

- 39. The above tweet clearly conveys a false and defamatory statement of fact to the public regarding Plaintiff, that is, that Plaintiff has been involved in the improper interrogation of a witness to a legal proceeding.
- 40. On July 11, 2019, Defendant Xiong posted another tweet falsely stating that Plaintiff (referred to as "Wangyanping") and Guo interrogated Ma Rui and coerced her into destroying evidence. Specifically, Defendant Xiong alleges the following:

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I have listened to the recording of Guo Wengui and Wangyanping's interrogation on Ma Rui 5 times. There are 9 occasions where Ma Rui was coerced to hand over the evidences of being raped, for example, the underwear contaminated by bodily fluid, the blood-stained bed sheet, the name of the pharmacy for getting birth-control pills, the number of times of being raped, the locations of the offenses and whether or not the boat staff and security guards were present etc. [emphasis added]

A full and correct copy of the tweet and translation is attached hereto as Exhibit C.

- The above tweet clearly makes false and defamatory statements of fact to the public 41. regarding Plaintiff, that is, that Plaintiff improperly interrogated and illegally coerced a witness to a legal proceeding into destroying evidence.
- 42. On July 13, 2019, Defendant Xiong again posted a defamatory tweet about the Plaintiff, falsely asserting that there is an alleged tape recording of Plaintiff and Guo interrogating Ma Rui. Specifically, Defendant Xiong tweeted that: "There are 3 main pieces of evidence that support the charge against Guo as a rapist: 3. The one-hour-forty-minute audio clip of Guo Wengui and Wang Yanping interrogating Ma Rui[.]" [emphasis added] A full and correct copy of the tweet and translation is attached hereto as Exhibit C.
- 43. The above defamatory tweet conveys false and defamatory statements of fact to the public regarding Plaintiff, specifically that Plaintiff participated in a nearly two-hour improper interrogation of Ma Rui, a witness to a legal proceeding.
- 44. On July 13, 2019, Defendant Xiong posted a tweet containing a link to a YouTube video. Defendant Xiong describes the video as: "Pangu Boss Guo Wengui having sex with female secretary Wang Yanping in office[.]" [emphasis added]. A full and correct copy of the tweet and translation is attached hereto as Exhibit C.
- 45. The above defamatory tweet conveys a false and defamatory statement of fact to the public regarding Plaintiff, specifically that Plaintiff, a married woman, has had sex at the office with a male colleague.

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46. Later that day, Defendant Xiong posted another defamatory tweet referencing the same video. Specifically, Defendant Xiong tweeted, in relevant part:

#### New evidences that support Guo Wengui as a suspect of rape are:

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### 4. The audio clip of Guo Wengui raping and assaulting Wang Yanping

[emphasis added]

A full and correct copy of the tweet and translation is attached hereto as Exhibit C.

47. The above defamatory tweets convey false statements of fact to the public regarding Plaintiff, specifically that Plaintiff has been raped and assaulted, and that Plaintiff, a married woman, has had sex with another man.

## Defendant Xiong's Harassment Campaign Culminates with Defendant Xiong Making an In-Person Death Threat Against Plaintiff

- 48. As part of the Defendants' conspiracy to intimidate and harass the Plaintiff, the Defendants agreed that Defendant Xiong would make in-person threats toward the Plaintiff. Pursuant to this agreement, Defendant Xiong's campaign to terrorize the Plaintiff, and completely destroy her family life and business reputation, shockingly progressed to the point where Defendant Xiong made an in-person death threat against the Plaintiff.
- 49. Specifically, on April 26, 2019, Defendant Xiong approached the Plaintiff outside of courtroom 232 in the New York County Supreme Court, located at 60 Centre Street, and ominously sat next to her, despite her request that he leave her alone. Defendant Xiong's approaching the Plaintiff after terrorizing her for many months in defamatory postings obviously placed her in fear of bodily harm, and she repeatedly asked Defendant Xiong to leave her alone, which he refused.

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50. Ignoring the Plaintiff's pleas to be left alone, Defendant Xiong then did the

unthinkable: he issued her a death threat, while jutting and raising his fists and arms threateningly

toward her face and body. Specifically, Defendant Xiong stated to the Plaintiff, while raising his

fists toward her:

"You will be killed in a car accident."

"You will never see your child or your husband again."

"You are throwing your life away."

51. Defendant Xiong's death threats issued to Plaintiff as he sat next to her placed

Plaintiff in fear of her life. Plaintiff again pleaded for Defendant Xiong to leave her alone. Yet,

faced with the Plaintiff terrorized and in tears, Defendant Xiong persisted in his course of terror

against Plaintiff, an innocent woman. Defendant Xiong hurled his head and arms toward the

Plaintiff and continued with his verbal abuse and assault.

52. To further make clear to Plaintiff that her life was in danger, Defendant Xiong

referenced the untimely death of a Chinese dissident residing in France of similar approximate age

as Plaintiff. Plaintiff lived in France for a number of years.

53. Defendant Xiong made his death threat to the Plaintiff intentionally, with malice,

and with the actual intent to cause the Plaintiff to fear serious bodily harm or death. Defendant

Xiong's statements were objectively meant to invoke fear in Plaintiff and convey that the Plaintiff

and her family would suffer serious bodily injury and death. Defendant Xiong's death threat was

made in furtherance of the conspiracy by the Defendants to wage a relentless campaign of

intimidation, harassment and defamation against the Plaintiff.

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**Defendant Xiong Escalates His Death Threat by Appearing at** Plaintiff's Doorstep, And Engaging in Violence to Terrorize Her

54. Defendant Xiong's terrorizing behavior did not stop with the death threat issued in

the courthouse. Following the April 26, 2019 threat on her life, pursuant to the Defendants'

conspiracy to intimidate and harass the Plaintiff, Defendant Xiong escalated the death threat by

coming directly to her doorstep and engaging in acts of violence, all making clear that Defendant

Xiong and the Defendants are prepared to carry out the threat on her life. As discussed below,

Defendant Xiong has repeatedly come to Plaintiff's place of work, despite the fact that he does not

live or work on that block, and has acted violently even when security was called.

55. There is no reasonable basis for Defendant Xiong to be near Plaintiff's place of

work as Defendant Xiong does not work or live on the block where Plaintiff's office is located.

The only reason for this behavior is to instill imminent fear of bodily harm in Plaintiff.

56. First, on July 25, 2019, having recently made the in-person death threat against the

Plaintiff, Defendant Xiong suddenly appeared directly outside the building where Plaintiff works

(162 E. 64th Street, New York County, New York). Defendant Xiong menacingly lurked outside

the building for at least thirty minutes.

57. The following day, on Friday, July 26, 2019, Defendant Xiong again menacingly

appeared outside of Plaintiff's place of work (162 E. 64th Street), and remained there for at least

thirty minutes. Subsequently, on Saturday, July 27, 2019, Defendant Xiong again appeared outside

Plaintiff's place of work (162 E. 64th Street), and remained ominously outside the front door of

the building for at least thirty minutes.

58. Thereafter, on Monday July 29, 2019, Defendant Xiong again menacingly appeared

directly outside the building where Plaintiff works. Because Defendant Xiong had appeared

outside of Plaintiff's work so many times, this time Plaintiff had a member of a security team go

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out to ask Defendant Xiong what his purpose was. Shockingly, rather than leaving, Defendant

Xiong confronted the member of the security team, lunging his body and arms toward the security

team member in a violent manner.

59. Defendant Xiong's defiance and acts of violence toward a security officer has only

heightened the very real fear of serious bodily injury and death that the Plaintiff has as a result of

Defendant Xiong's ongoing acts of harassment, intimidation, violence and death threats.

60. Indeed, despite his interaction with the security guard the previous day, Defendant

Xiong again menacingly appeared the very next day (July 30, 2019) directly outside of the building

where Plaintiff works and attempted to gain access to the building. This was clearly in an attempt

to harm and harass Plaintiff and further showing that Defendant Xiong has malicious intent and

that he is completely undeterred by any security team.

61. Plaintiff, fearing for her safety and well-being, filed a police report with the NYPD,

and it is Plaintiff's understanding that an investigation into Defendant Xiong's criminal conduct

ensued and is ongoing.

Defendant Xia Yeliang's Ongoing Campaign to Destroy the Plaintiff's Reputation

62. As part of the Defendants' conspiracy, Defendant Xia Yeliang ("Yeliang") has also

engaged in an extensive malicious campaign to destroy the reputation of Plaintiff, by making what

are completely baseless and false purported statements of fact about the Plaintiff which have no

basis in fact. Defendant Yeliang acted in concert with the other defendants, who all coordinated

their defamation campaign in order to maximize the damage to Plaintiff's reputation.

63. For example, on October 26, 2017, Defendant Yeliang published a post to his

Twitter account stating that Plaintiff had committed adultery with her male work colleague Guo.

The tweet stated:

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Guo Wengui himself practices what he preaches in this way. He claimed that he slept with Li, You's lover; he committed adultery with Wang, Yanping who has a husband; he threatened and forcibly seized others' corporate assets, on and on, you name it. [emphasis added]

- 64. The above defamatory tweet conveys a false statement of fact to the public regarding Plaintiff: namely, that Plaintiff – a married woman – is involved in an extramarital sexual relationship with another man and has committed adultery. A true and correct copy of this post, and a certified translation thereof, are attached hereto as Exhibit D.
- 65. On January 7, 2018, Defendant Yeliang published a tweet stating: "Wang Yanping' voice of having sex is already well familiar to the public." A true and correct copy of this post, and a certified translation thereof, are attached hereto as Exhibit E. This internet posting conveys a false statement of fact to the public regarding the Plaintiff: namely, that the Plaintiff engaged in extramarital sex, and that an audio tape exists of this inappropriate sexual activity. Indeed, as set forth herein, taken in context of other postings regarding the Plaintiff by Defendant Yeliang on his Twitter account, it is clear that in this post he is accusing Plaintiff of an extramarital sexual relationship, and that a recording exists of Plaintiff engaged in an illicit sexual encounter.
- 66. Defendant Yeliang has continued his campaign of defamation against the Plaintiff. On January 13, 2019, Defendant Yeliang published two posts to his Twitter account which stated that there is an audio recording of Plaintiff engaging in extramarital sex with Guo, and Defendant Yeliang even insists that this recording is authentic. A true and correct copy of these posts, and certified translations thereof, are attached hereto as Exhibit E. The first post stated:

Those ordinary masses can stop imagining themselves as Guo's people. When the audio recording of Liar Guo and Wang, Yanping having sex was released, a lot of Guo's stupid fans said that it was a fake. Eventually it matched perfectly with Wang Yanping's voice and **laughter in her interview with Ming Jing**. [emphasis added]

The second post stated:

At the end of June 2017, someone came to argue with me saying the audio recording about Liar Guo was a fake, since current technology could synthesize anyone's voices in the conversation. The result would be good enough to disguise the genuine from the fake. I challenged him and said, please make a half-hour audio recording of me talking with Wang Yanping while we are having sex, then compare with Guo and Wang's recordings. Are you able to fake it as good as the real? 1.5 years has already passed, where are the idiot fans of Guo, all die out? [emphasis added]

- 67. The above defamatory tweets convey false statements of fact to the public regarding Plaintiff: namely, that Plaintiff a married woman is involved in an extramarital sexual relationship, and that an authentic audio recording of Plaintiff having sex with Guo exists.
  - 68. On March 9, 2019, Defendant Yeliang published a tweet stating:

Wang, Ping (Wang, Yanping?) = Guo, Wengui? What kind of relationship do they have? Master and servant / husband and wife or lovers? A legal document that shall be signed by the party was signed by an employee instead. Who is going to take the legal responsibility? If 18/F is held in pledge, Liar Guo and Wang, Yanping will pass the buck and decline the responsibility.

- 69. The above defamatory tweet, viewed in the context of the additional defamatory tweets published by Defendant Yeliang, clearly and falsely represents that there is a basis to state that the Plaintiff is engaged in an intimate extramarital affair with Guo. A true and correct copy of the post quoted above, and a certified translation thereof, is attached hereto as Exhibit E.
- 70. On March 11, 2019, Defendant Yeliang published a defamatory tweet asserting that there are multiple recordings of the Plaintiff engaging in adultery. Specifically, the tweet states:

Liar Guo said in his recorded conversation with Li, You that he had slept with Li, You's lover for three times. There are as many as six audio recordings of Liar Guo and Wang, Yanping committing adultery. These evidences can be easily searched online. [emphasis added]

71. The above defamatory tweet conveys false statements of fact to the public regarding Plaintiff: the tweet states that Plaintiff – a married woman – is involved in an extramarital sexual

relationship, has committed adultery, and also states that there are six recordings capturing Plaintiff engaged in adultery. A true and correct copy of the post quoted above, and a certified translation thereof, is attached hereto as Exhibit E.

72. On July 27, 2019, Defendant Yeliang again published a defamatory post to his twitter account, which insisted that the purported recordings of Plaintiff engaging in an extramarital affair were authentic and that their authenticity was verified. Specifically, the defamatory tweet states:

> Ding, pei, can you tell which recording was fabricated? The voices of Liar Guo and Wang, Yanping in those recordings have long before been verified again and again by their own voice in public occasions.

- 73. A true and correct copy of the post quoted above, and a certified translation thereof, are attached hereto as Exhibit E.
- 74. The above defamatory statements, made by Defendant Yeliang with malice and knowledge of their falsity, were made with the intent of destroying Plaintiff's reputation, her business relationships, and her relationship with her husband.

#### Defendant Li Hongkuan's Ongoing Campaign of Defamation of the Plaintiff

- 75. Acting in concert with the other defendants, and with the malicious intent to maximize the damage to Plaintiff's reputation, Defendant Li Hongkuan ("Hongkuan") issued a similar series of defamatory posts regarding the Plaintiff, overlapping in time with the defamatory postings by the other defendants.
- 76. On November 29, 2017, Defendant Hongkuan posted a tweet that contained defamatory statements regarding the Plaintiff, falsely stating that the Plaintiff intimidated an

alleged rape victim. A true and correct copy of the post, and a certified translation thereof, is attached hereto as Exhibit F. Specifically, the tweet states:

> Excerpts from a reader's letter: "Guo, Wengui and Wang, Yanping threatened and persecuted Ma Rui, forcing her to turn in the rape evidences." Please listen to the way how Wang, Yanping speaks and how brutal Guo, Wengui sounds. When Ma, Rui eventually left Guo, Wengui, he turned himself into a little sheep and begged. [emphasis added]

- 77. The above tweet makes a false and defamatory statement of fact to the public regarding Plaintiff. Specifically, it accuses Plaintiff of threatening an alleged rape victim.
- 78. On December 4, 2017, Defendant Hongkuan posted a defamatory tweet regarding Plaintiff, which falsely asserted that Plaintiff was guilty of criminal activity. Specifically, the tweet stated: "Under the new China's democracy and rule of law, Rapist Guo has no way to hide. Wang, Yanping is as guilty as the rapist!" A true and correct copy of the post, and a certified translation thereof, is attached hereto as Exhibit F.
- 79. The above defamatory tweet makes a false statement of fact to the public regarding Plaintiff, namely that the Plaintiff is guilty of illegal and improper activity. When taken in context of the other postings by Defendant Hongkuan, this post conveys that Plaintiff is guilty of extramarital sex with Guo and other improper conduct.
- 80. On January 25, 2018, Defendant Hongkuan posted a defamatory tweet regarding the Plaintiff, falsely representing that Plaintiff was involved in an intimate extramarital relationship with her work colleague Guo. The tweet escalated the defamation campaign to a misogynous, hate-filled expression of violence. Specifically, the tweet stated:

No way. My direct loss has been too much. He [Guo] fucked Wang Yanping every day having fun like in the heaven. But I have no access to a woman in bed. Whenever I think of this, I want to fuck all the women in Guo, Wengui's family, meanwhile curse all of his family members died of cancer. [emphasis added]

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81. The above tweet – which is outrageous, misogynous and violent in tone – conveys

a false statement of fact to the public regarding Plaintiff: namely, that Plaintiff – a married woman

- was involved in an intimate extramarital relationship, whereby she "fucked" Guo every day. In

addition, Defendant Hongkuan threatens to "fuck" all the women as described, and to wish these

women death by cancer. A true and correct copy of the post, and a certified translation thereof, is

attached hereto as Exhibit F.

82. On March 20, 2018, Defendant Hongkuan posted a defamatory tweet regarding the

Plaintiff, which falsely asserted that she had been raped by her work colleague Guo. Specifically,

the tweet states:

There are only two options: 1) Either Guo, Wengui be prepared for his jail time in the U.S., 2) Or be prepared for the rejection of his political asylum

case and extradited back to China to face China's prosecution. To smash

on the right points: 1) To further validate his criminal acts-- <u>raped Ma</u>, **Rui, Wang, Yanping**, Yu, Yong and Qu Guojiao... [emphasis added]

83. The above defamatory tweet conveys false statements of fact to the public regarding

Plaintiff, namely that she was a rape victim, and had sex with a work colleague while she is married

to another man. A true and correct copy of the post, and a certified translation thereof, is attached

hereto as Exhibit F.

84. On May 7, 2018, Defendant Hongkuan posted a defamatory tweet regarding the

Plaintiff, which falsely represented that she had engaged in extramarital sex. The tweet contained

a photograph of the Plaintiff, and was captioned "Another two audio clips were released, which

are coming from the tapped cell phone of Wang Yanping, a fucked female assistant of Guo

Wengui." A true and correct copy of the post, and a certified translation thereof, is attached hereto

as Exhibit F.

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85. The above defamatory tweet conveys a false statement of fact to the public regarding Plaintiff: namely that the Plaintiff – a married woman – had engaged in extramarital sex with Guo.

86. On July 10, 2018, Defendant Hongkuan posted a defamatory tweet regarding the Plaintiff, falsely representing that she was involved in forging a signature in an effort to deceive a court. Specifically, the tweet states:

Monster Guo is the expert of frauds. He forged my signature recently to deceive the court. This is under investigation now. Guo, Wengui coached Wang, Yanping and Qu, Guojiao in person on how to fabricate and deceive the court.

- 87. The above defamatory tweet conveys a false statement of fact to the public regarding Plaintiff, namely, that Plaintiff intentionally forged a document with the intent to deceive a court. A true and correct copy of the post, and a certified translation thereof, is attached hereto as Exhibit F.
- 88. On July 30, 2018, Defendant Hongkuan posted a defamatory tweet regarding the Plaintiff, falsely representing that she was involved in an intimate extramarital affair with her work colleague Guo. Specifically, the tweet states:

Indeed Old Guo knows very well that he won't have much access to all his assets in China ever after. All his powerful connections behind the scene were collapsed. To come back in China is even harder than climbing up to the sky. Himilaya is just a dream. Now even the thousand-year sage monarch (a term used by Guo to refer to President Xi, Jinping) he is relying upon is besieged with enemies all around. Just try to fight for staying in the U.S. and spend the rest of the life with Wang, Yanping and Yue, Qingzhi. Those who were smeared black by you with HPV infection can't even be with a woman anymore. Shouldn't you be satisfied? [emphasis added]

89. The above defamatory tweet conveys a false statement of fact to the public regarding Plaintiff, namely, that Plaintiff – a married woman – is involved in an intimate

extramarital relationship with Guo. A true and correct copy of the post, and a certified translation thereof, is attached hereto as Exhibit F.

90. On August 8, 2018, Defendant Hongkuan posted a defamatory tweet regarding the Plaintiff, falsely stating that she engaged in extramarital sexual acts, including anal sex, with her work colleague Guo. Specifically, the tweet states:

No way, how can I compete with him in having sex. He could hold Yanping on the left side, thrusting into her anus, then turned around and held Qing Zhi in his right arm...

- 91. The above defamatory tweet conveys a false statement of fact to the public regarding Plaintiff, namely, that Plaintiff a married woman engaged in extramarital sexual acts, including engaging in anal sex with Guo. A true and correct copy of the post, and a certified translation thereof, is attached hereto as Exhibit G.
- 92. On August 11, 2018, Defendant Hongkuan posted a defamatory tweet regarding Plaintiff, which falsely asserted that Plaintiff was involved in the alleged rape of another woman, Ma Rui. Specifically, the tweet stated:

To presiding over these issues, Wang, Yanping and those involved must testify in the court as witnesses. Otherwise, the judge can hardly make the judgment. At the moment, the first thing among the first is that the government must submit the semen stain that Ma, Rui possessed, file the case in New York and arrest Guo, Wengui. It is a criminal case.

- 93. The above defamatory tweet conveys a false statement of fact to the public regarding Plaintiff, namely the false allegation that Plaintiff was involved and complicit in the rape of another woman. A true and correct copy of the post, and a certified translation thereof, is attached hereto as Exhibit G.
- 94. On August 17, 2018, Defendant Hongkuan posted a defamatory tweet regarding the Plaintiff, falsely stating that she engaged in extramarital sexual acts, including anal sex, and that there were audio recordings of these acts. Specifically, the tweet states:

Monster Guo and Qu, Guojiao who is from Hong Kong had given birth to a baby. The audio and video recordings of him having anal sex with the old party member Wang, Yanping are spreading every day all

over the world. Yet he still shamelessly boasts that he loves his wife.

[emphasis added]

95. The above defamatory tweet conveys false statements of fact to the public regarding Plaintiff, namely, that Plaintiff – a married woman – engaged in extramarital sexual acts, including engaging in anal sex with Guo, and that there are audio recordings of the Plaintiff engaging in these acts. A true and correct copy of the post, and a certified translation thereof, is attached hereto as Exhibit G.

96. On August 26, 2018, Defendant Hongkuan posted a defamatory tweet regarding the Plaintiff, falsely representing that Plaintiff was involved in an intimate extramarital relationship with her work colleague Guo. Specifically, the tweet stated:

According to "Jin Ping Mei" (an ancient Chinese porn novel), Xi Menqing = Guo, Wengui, then Wang, Yanping = Pan, Jinlian (a female figure in the novel, who betrayed her husband and has intimate contact with Xi Menqing).

- 97. The above defamatory tweet conveys a false statement of fact to the public regarding Plaintiff, namely, that Plaintiff a married woman is involved in an intimate extramarital relationship. A true and correct copy of the post, and certified translation thereof, is attached hereto as Exhibit G.
- 98. On September 11, 2018, Defendant Hongkuan posted a defamatory tweet regarding the Plaintiff, falsely stating that she engaged in extramarital sexual acts, including anal sex. Specifically, the tweet states:

Monster Guo likes to have anal fissure with Yanping, so he spread the rumors that an old man Meng, Jianzhu had anal sex with Wang, Fang.

99. The above defamatory tweet conveys a false statement of fact to the public regarding Plaintiff, namely, that Plaintiff – a married woman – has repeatedly engaged in

extramarital sexual relations, including engaging in anal sex with Guo. A true and correct copy of the post, and a certified translation thereof, is attached hereto as Exhibit G.

100. On October 6, 2018, Defendant Hongkuan posted a defamatory tweet regarding the Plaintiff, falsely stating that she engaged in extramarital sexual acts, including engaging in anal sex with Guo. Specifically, the tweet states:

Only a penis can shoot so many "bullets." Wengui's "gun" probably had been powerless long before. Since Qu, Guoqiao is infected with HPV, his penis should have been infected with virus too. I guess he has already become incompetence. Someone told me the anal fissure/ bleeding with Wang, Yanping was just a show. He knows that there is a special Task Force monitoring him on 24/7.

- 101. The above defamatory tweet conveys false statements of fact to the public regarding Plaintiff, namely, that Plaintiff a married woman has repeatedly engaged in extramarital sexual relations, including anal sex with Guo, and has contracted sexually transmitted diseases as a result. A true and correct copy of the post, and a certified translation thereof, is attached hereto as Exhibit G.
- 102. On November 17, 2018, Defendant Hongkuan posted a defamatory tweet regarding the Plaintiff, falsely stating that she engaged in extramarital sexual acts, including engaging in anal sex with Guo, and that she has contracted various sexually transmitted diseases as a result. Specifically, the tweet states:

It is very unhealthy for Monster Guo and Yanping to have fun in this way. There are a lot of bacteria and virus around the anus. No wonder Monster Guo transmitted HPV around and becomes an expert in publicizing uterus cancer and hysterectomy.

103. The above defamatory tweet conveys false statements of fact to the public regarding Plaintiff, namely, that Plaintiff – a married woman – has repeatedly engaged in extramarital sexual relations, including engaging in anal sex with Guo, and has contracted sexually transmitted

diseases as a result. A true and correct copy of the post, and a certified translation thereof, is attached hereto as Exhibit G.

104. On December 8, 2018, Defendant Hongkuan posted a defamatory tweet regarding the Plaintiff, which falsely and graphically stated that she had repeatedly engaged in extramarital sexual acts, including anal sex, with her work colleague Guo. Specifically, the tweet states:

Guo, Wengui is insane and sick psychologically. He is more autocratic than the CCP with zero tolerance for criticism. He is untouchable just like the ass of a tiger. Guess he was often fucked by the old rich women through his anus in the past, so he probably has grown some enjoyment for anal sex. Every time when he has sex with Wang, Yanping, he will thrust into her anus. And he mentions anal hemorrhoids every day. [emphasis added]

- 105. The above defamatory tweet conveys a false statement of fact to the public regarding Plaintiff, namely, that Plaintiff a married woman has repeatedly engaged in extramarital sexual relations, including repeatedly engaging in anal sex with Guo. A true and correct copy of the post, and a certified translation thereof, is attached hereto as Exhibit G.
- 106. On December 16, 2018, Defendant Hongkuan posted a defamatory tweet regarding the Plaintiff, falsely asserting that there is an audio recording of the Plaintiff engaging in extramarital sexual acts, including engaging in anal sex with Guo. Specifically, the tweet states:

Liu, Yanping's contribution to the success of the work is tremendous. He arranged to motivate Zhang, Zhiwei to steal more than a hundred of the tape recording data files. Thus we can hear Guo, Wengui and Wang, Yanping having sex, even the live audio of them having anal sex.

107. The above defamatory tweet conveys false statements of fact to the public regarding Plaintiff: namely, that Plaintiff – a married woman – is involved in an extramarital intimate relationship, including engaging in anal sex with Guo, and that there are recordings of these falsely asserted acts. A true and correct copy of the post, and certified translation thereof, is attached hereto as Exhibit G.

108. On January 9, 2019, Defendant Hongkuan posted a defamatory tweet regarding the Plaintiff, which asserted that she was involved in an extramarital affair with her work colleague Guo. Specifically, the tweet stated:

Monster Guo Wengui is a rogue and the worst among the worst. Little ants listened to his preaching of morality and were mesmerized by his eloquence. He said, don't involve with the friend's women, don't involve with the married women. Otherwise the bad luck follows you. Yu, Li from Peking University Founder Group is the woman of Li, You. Monster Guo had an affair with her, hadn't he? Wang, Yanping is a wife and an old Bolsheviks party member of 18 years. He involved with her as well.

- 109. The above defamatory tweet conveys a false statement of fact to the public regarding Plaintiff, namely, that Plaintiff a married woman is involved in an extramarital affair with Guo. A true and correct copy of the post, and certified translation thereof, is attached hereto as Exhibit G.
- 110. On January 19, 2019, Defendant Hongkuan posted a defamatory tweet falsely accusing Plaintiff of illegally forging the signature of her work colleague Guo. Specifically, Defendant Hongkuan's tweet stated that:

#Guo, Wengui is such a weird. To put it simply, he has no concept of law in rule. Signature is such an important detail in the court proceeding. You can't overlook its significance. Well Monster Guo directed Wang, Yanping to sign for him where he was supposed to sign. He is luck if the court doesn't look into it.

The tweet also included a photograph of the signature referred to above, with a caption stating, "Wang, Yanping forged Guo's signature." A true and correct copy of the post, and certified translation thereof, is attached hereto as Exhibit G.

111. The above defamatory tweet by Defendant Hongkuan conveys a false and defamatory statement of fact to the public regarding Plaintiff. Specifically, the tweet falsely conveys that Plaintiff has illegally forged a signature in a legal proceeding.

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112. On April 27, 2019, Defendant Hongkuan posted a defamatory tweet regarding

Plaintiff, which falsely alleged that the Plaintiff was guilty of criminal activity. Specifically, the

tweet states:

The player may get lost in the game. Wang, Yanping is now facing the most difficult choices. She may not be able to make the best judgment and assessment over her current situations. The magnitude of Wang, Yanping's sense of law now will decide how she can protect herself of her interests and her criminal liability by the time of the imminent perishing

of Monster Guo.

113. The above defamatory tweet conveys false statements of fact to the public regarding

Plaintiff: namely, that she has engaged in criminal activity and there is a basis for her being held

criminally liable for her actions. A true and correct copy of the post, and certified translation

thereof, is attached hereto as Exhibit G.

114. On May 13, 2019, Defendant Hongkuan published a defamatory tweet regarding

Plaintiff, which falsely represented that she had come to the United States of America illegally,

and was engaged in an intimate extramarital relationship. Specifically, the tweet stated, "Wang,

Yanping, you old Bolshevik, how did you sneak into the New York of the United States and get

onto the bed? Be honest and confess." A true and correct copy of the post, and certified translation

thereof, is attached hereto as Exhibit G.

115. The above defamatory tweet, considered in the context of Defendant Hongkuan's

additional defamatory tweets described above, conveys false statements of fact to the public

regarding the Plaintiff: it conveys that the Plaintiff illegally entered the United States of America,

and that Plaintiff was involved in an intimate extramarital relationship with her work colleague

Guo.

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116. The above defamatory statements, made by Defendant Hongkuan with malice and knowledge of their falsity, were made with the intent of destroying Plaintiff's reputation, her business relationships, and her relationship with her husband.

#### Defendant Gao Bingchen's Ongoing Campaign of Defamation of the Plaintiff

- Acting in concert with the other defendants, and with the malicious intent to 117. maximize the damage to Plaintiff's reputation, Defendant Gao Bingchen ("Bingchen") issued a similar series of defamatory posts regarding the Plaintiff, overlapping in time with the defamatory postings by the other defendants.
- 118. On May 12, 2019, Defendant Bingchen published a defamatory post on his Twitter account regarding the Plaintiff, which stated that she committed perjury and engaged in extramarital sex. Specifically, the tweet states:

The post that Brother Tanghan published today is very interesting. I have a bit of sympathy toward Cheater Guo's female secretary [Plaintiff], for her inability to go back home, to see her child and hug her husband. Yet, it is bullshit that she talked about loyalty in the court and asserted that the audio files on the Internet of her having sex were fabricated. The voice is recognizable by anyone. There is zero chance of fabrication, not to mention they were sent out for a technical verification long time ago and their authenticity is determined. Or what about I give you some big money and you please fabricate a genuine audio file of me?

A true and correct copy of the post, and certified translation thereof, is attached hereto as Exhibit Η.

119. The above defamatory tweet conveys several false statements of fact to the public regarding the Plaintiff. This tweet, viewed in context of the other posts by Defendant Bingchen, is clearly referring to Plaintiff as Guo's female secretary. First, it falsely asserts that the Plaintiff committed perjury by lying in a court proceeding. Second, it falsely asserts that the Plaintiff has engaged in extramarital sex. Third, it falsely asserts that there are recordings of the falsely alleged extramarital sexual activity, and that these recordings have been authenticated.

Defendants' Campaign of Ongoing Harassment Has Also Caused Serious Emotional and Economic Damages, and Destruction of Her Marriage

120. Defendants' malicious defamation campaign has caused Plaintiff serious damage

to her reputation. Defendants' malicious defamation campaign has also caused the destruction of

Plaintiff's marriage and prevented her from seeing her young son, as it has included, among other

things, the false allegation of an ongoing extra-marital sexual relationship. As a result of the

destruction of her reputation and marriage, Plaintiff has suffered extreme emotional distress.

121. Defendants' malicious defamation campaign has also caused Plaintiff substantial

damages to her business contracts and relationships. For example, because of Plaintiff's deep

experience with and knowledge of Chinese business practices, Plaintiff had a lucrative consulting

contract with ACA Investment Management Limited ("ACA"), under which Plaintiff advised a

Hong Kong business on local customs, regulations, and policies in mainland China.

122. Under the contract with ACA, Plaintiff was to receive \$1.5 million a year.

123. Defendants were aware of Plaintiff's contract with ACA, and her prospective

business relationship with ACA. Defendants maliciously intended to destroy Plaintiff's business

relationships, including with ACA, by publicly defaming her as set forth in detail above.

124. Defendants succeeded in destroying Plaintiff's business relationship with ACA.

After Defendants began their internet campaign to destroy Plaintiff's reputation, ACA contacted

Plaintiff in or about August 2017 and informed her that the Defendants' allegations were not

consistent with the image it needed to portray to its client base and business counterparts, and that

as a result of the negative publicity, ACA would terminate their relationship with the Plaintiff.

125. Thus, Defendants' malicious defamation of the Plaintiff not only terrorized her,

destroyed her reputation and destroyed her relationship with her husband and family, but has also

directly and proximately interfered with her contract and business relationship with ACA.

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126. Indeed, as a result of the termination of her contract with ACA, Plaintiff lost

millions of dollars in damages from the loss of this business relationship alone.

127. In addition to monetary damages, Plaintiff is also entitled to preliminary and

permanent injunctive relief, including enjoining the Defendants from coming near the Plaintiff or

her place of residence or business, or issuing any further threats to Plaintiff or her family.

128. Plaintiff is entitled to an award of compensatory damages in an amount to be

determined at trial. In addition, Defendants' actions were deliberate, willful, intentional, wanton,

malicious, and oppressive and in conscious disregard for the rights of Plaintiff and should be

punished with an award of punitive damages in an amount to be determined at trial.

129. The Defendants acted in concert with each other, along with Defendant Xiamin

Xiong, a New York resident who actively participated in the defamation and harassment campaign.

The Defendants and Xiong coordinating their similar outrageous false public statements to the

public, with the malicious intent to maximize the damage to Plaintiff's reputation.

130. The Defendants intentionally and purposefully projected their statements into New

York with the intent to harm Plaintiff, a New York resident. The Defendants' internet posts and

other coordinated conduct of the Defendants expressly targeted Plaintiff in New York. During the

time period of the defamatory postings directed to New York, upon information and belief,

Defendants Yeliang, Hongkuan and Bingchen came to New York and met with Defendant Xiong

to plan, coordinate and execute their defamation and harassment campaign directed to the Plaintiff.

Upon information and belief, Defendants Yeliang, Hongkuan and Bingchen also called Defendant

Xiong and communicated with Defendant Xiong while he was in New York, to plan, coordinate

and execute their defamation and harassment campaign directed to the Plaintiff, a resident of New

York.

As set forth above in detail, the Defendants' conspiracy also included the assault 131. and intimidation of Plaintiff in New York, both in a New York courthouse, and outside her place of work in New York.

### FIRST CLAIM FOR RELIEF (Against Defendant Xiong)

- The above paragraphs are repeated and incorporated by reference as if fully set 132. forth herein.
- 133. Defendant Xiong's physical confrontation of the Plaintiff on April 26, 2019, including his raising of his fists toward the Plaintiff and issuing her a death threat (as set forth above in detail), was intended to place Plaintiff in apprehension of serious harmful or offensive contact and in great fear of imminent serious bodily injury and death.
- 134. As a direct and proximate result of Defendant Xiong's conduct, Plaintiff was placed in reasonable apprehension of serious harmful or offensive contact and in great fear of imminent serious bodily injury and death, and has suffered severe emotional distress.
- As a result of Defendant Xiong's assault, Plaintiff has suffered, and will continue 135. to suffer, damages to be proven at trial.
- 136. In addition to monetary damages, Plaintiff is also entitled to preliminary and permanent injunctive relief, including enjoining Defendant Xiong from coming near the Plaintiff or her place of residence or business, or issuing any further threats to Plaintiff or her family.
- 137. Plaintiff is entitled to an award of compensatory damages in an amount to be determined at trial. In addition, Defendant Xiong's actions were deliberate, willful, intentional, wanton, malicious, and oppressive and in conscious disregard for the rights of Plaintiff, and should be punished with an award of punitive damages in an amount to be determined at trial.

**SECOND CLAIM FOR RELIEF DEFAMATION** 

(Against All Defendants)

138. The above paragraphs are repeated and incorporated by reference as if fully set

forth herein.

139. The defamatory statements that are set out with particularly in paragraphs 30-47,

66-74, 96-116, and 118-119 above and that Defendants published on their social media profiles

about Plaintiff are false and defamatory, and are not the subject of any privilege.

140. Defendants had actual knowledge that the information they published was false,

and they acted with malice, including the intent to harass the Plaintiff and destroy her reputation.

In the alternative, in knowingly publishing highly derogatory information about a private figure

(the Plaintiff), Defendants acted in a grossly irresponsible manner and without due consideration

for the standards of information gathering.

141. Defendants' published false comments regarding the Plaintiff were made with the

intent to harm Plaintiff and with actual malice.

142. Defendants' defamation has directly and proximately caused Plaintiff's special

damages, including but not limited to damage to her reputation, her business relationships, her

relationship with her husband and child, and severe emotional distress.

In addition to monetary damages, Plaintiff is also entitled to preliminary and 143.

permanent injunctive relief, including enjoining the Defendants' defamation and interference with

business relations. Because Defendants have placed Plaintiff's personal character and reputation

publicly at issue, Plaintiff is entitled to a declaratory judgment that Defendants' statements are

false.

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144. Plaintiff is entitled to an award of compensatory and punitive damages in an amount

to be determined at trial.

THIRD CLAIM FOR RELIEF <u>DEFAMATION PER SE</u> (Against All Defendants)

145. The above paragraphs are repeated and incorporated by reference as if fully set

forth herein.

146. The defamatory statements that are set forth in paragraphs 30-47, 66-74, 96-116,

and 118-119 that Defendants published on their social media profiles about Plaintiff are false and

defamatory, and not the subject of any privilege.

147. Defendants had actual knowledge that the information they published was false,

and they acted with malice, including the intent to harass the Plaintiff and destroy her reputation.

In the alternative, in knowingly publishing highly derogatory information about a private figure

(the Plaintiff), Defendants acted in a grossly irresponsible manner and without due consideration

for the standards of information gathering.

148. Defendants' false statements concerning the Plaintiff include accusations that

Plaintiff has committed serious crimes, and are of the type that tend to injure Plaintiff in her trade,

business, and profession and impute salacious and immoral conduct to Plaintiff. Defendants' false

statements about Plaintiff made to public include the following: that Plaintiff, who is a married

woman, is involved in an extra-marital sexual relationship with another man, including anal sex;

that Plaintiff has supposedly been raped by a work colleague; that Plaintiff has destroyed evidence

relevant to a legal proceeding; and that Plaintiff has engaged in wrongful interrogation and

detention of an alleged witness in a legal proceeding.

149. The published false comments were made with the intent to harm Plaintiff and with

actual malice.

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150. Defendants' defamation has directly and proximately caused Plaintiff's damage, including but not limited to damage to her reputation, her business relationships, her relationship with her husband and child, and severe emotional distress.

- 151. The injurious character of Defendants' false statements is a self-evident fact of common knowledge which not be pleaded or proved.
- 152. As such, Defendants' false statements are actionable without proof of special damages.
- 153. In addition to monetary damages, Plaintiff is also entitled to preliminary and permanent injunctive relief, including enjoining the Defendants' defamation and interference with business relations.
- 154. Because Defendants have placed Plaintiff's personal character and reputation publicly at issue Plaintiff is entitled to a declaratory judgment that Defendants' statements are false.

# FOURTH CLAIM FOR RELIEF TORTIOUS INTERFERENCE WITH CONTRACT (Against All Defendants)

- 155. The above paragraphs are repeated and incorporated by reference as if fully set forth herein.
  - 156. Plaintiff had a valid contract with ACA for consulting services.
  - 157. Defendants were aware of Plaintiff's contract with ACA.
  - 158. Defendants intentionally interfered with Plaintiff's contract with ACA.
  - 159. Defendants acted solely out of malice or wrongful means.
- 160. As a direct and proximate result of Defendants malicious and wrongful actions, ACA breached its contract with Plaintiff.

161. As a direct and proximate result of the Defendants' malicious and wrongful actions, Plaintiffs suffered damages. To compensate for these damages, Plaintiff is entitled to an award of compensatory and punitive damages in an amount to be determined at trial.

#### FIFTH CLAIM FOR RELIEF TORTIOUS INTERFERENCE WITH PROSPECTIVE BUSINESS RELATIONS (Against All Defendants)

- 162. The above paragraphs are repeated and incorporated by reference as if fully set forth herein.
- 163. Plaintiff is also entitled to damages for tortious interference with prospective business relations.
  - 164. Plaintiff had a business relationship with ACA.
- 165. Defendants knew of Plaintiff's business relationship with ACA and intentionally interfered with it.
  - 166. Defendants acted solely out of malice or wrongful means.
- Defendants' interference directly and proximately caused injury to Plaintiff's 167. relationship with ACA, as evidenced by ACA terminating its business relationship with Plaintiff. As a direct and proximate result of Defendants malicious and wrongful actions, ACA ended its ongoing business dealings with the Plaintiff.
- 168. As a direct and proximate result of the Defendants' misconduct, Plaintiff is entitled to an award of compensatory and punitive damages in an amount to be determined at trial.

#### PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for judgment against Defendants as follows:

a. An award of compensatory and punitive damages in an amount to be determined at trial:

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b. Preliminary and permanent injunctive relief enjoining Defendants and their

respective agents, servants, employees, officers, and assigns, and all other persons

acting in active concert or participation with him, from further publication of any

false, malicious, defamatory or materially misleading comments regarding

Plaintiff;

c. Preliminary and permanent injunctive relief unction enjoining Defendants and their

respective agents, servants, employees, officers, and assigns, and all other persons

acting in active concert or participation with him, from coming near the Plaintiff or

her place of residence or business;

d. A declaratory judgment that Defendants' comments regarding Plaintiff are false;

e. An award of attorneys' fees, costs, and expenses; and

f. Such other and further relief as the Court deems just and proper.

Dated: New York, New York August 26, 2019

#### CATAFAGO FINI LLP

/s/ Tom M. Fini

Tom M. Fini, Esq. Jacques Catafago, Esq. The Empire State Building 350 Fifth Avenue, Suite 7710 New York, NY 10118 212-239-9669 tom@catafagofini.com Counsel for Plaintiff

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#### VERIFICATION

STATE OF NEW YORK	)
	) ss
COUNTY OF NEW YORK	)

I, Yanping Wang, am the Plaintiff in the above entitled action. I have read the foregoing Amended Complaint and know the contents thereof. The contents are true to my own knowledge except as to matters therein stated to be alleged upon information and belief, and that as to those matters, I believe them to be true.

YANPING WANG

Subscribed and Sworn to before me on

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AUGUST 26, 2019

NOTARY PUBLIC

DANIEL THOMAS PODHASKIE Notary Public, State of New York Reg. No. 02PO6394578 Qualified in Queens County Commission Expires July 8, 2023 FILED: NEW YORK COUNTY CLERK 08/26/2019 06:37 PM
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# **EXHIBIT A**

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#### **AFFIDAVIT**

STATE OF NEW YORK	)
	) ss:
COUNTY OF QUEENS	)

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Sworn to before me this Wednesday, August 07, 2019

Shenyi Glass,
Mandarin Interpreter & Translator

Signature, Notary Public

FRANCIS SHERIDAN
NOTARY PUBLIC-STATE OF NEW YORK
No. 01SH6352366
Qualified In Queens County
My Commission Expires 12-27-2626

Stamp, Notary Public

TYSCEF DOC. NO. CASE 1:23-CT-00118-AT DOCUMENT 81-21 FILED 06/05/23 Page 40 of 120 NYSCEF: 08/26/2019



### https://twitter.com/sinofreedom/status/889300332320362500



Guo Wengui directed Wang Yanping to steal the contents of emails from the mailboxes. The quotation from the company "T&M" was from \$US75,000 to \$US100,000 for per mailbox that is hacked.

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### https://twitter.com/sinofreedom/status/918671402345037824





王雁平:你要想明白了,马蕊一案将要刑诉,你必然要成为被告之一,因为你有协助郭文贵毁灭犯罪证据的嫌疑,在这个关键时刻你必须抢先控告郭文贵性侵,这本来就是事实,你已经被郭文贵骗的很惨,有家不能回,有孩子老公被活活拆散。你被告上法庭就很难翻身了,聪明一点就立刻把郭告了,变被动为主动。

Translate Tweet

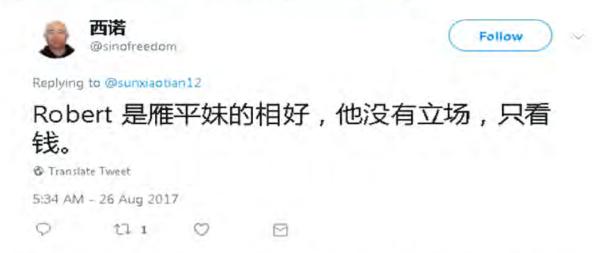
7:55 PM - 12 Oct 2017

199 Retweets 66 Likes



Wang Yanping: You have to think clearly. The case of Ma Rui is going to be a criminal case. You definitely will become one of the defendants, because you are suspected of assisting Guo Wengui in destroying the forensic evidence. You should first sue Guo Wengui for sexual assault at this critical moment, after all it is the truth. You have been terribly deceived by Guo Wengui-you cannot go back home and you have been separated from your child and husband out of your choice. Once you are sued in court, it will be very hard to turn things around. Be smart and sue Guo Wengui immediately to turn the table around and take the situation under your control.

# https://twitter.com/sinofreedom/status/901422516547321856



Robert has an intimate relationship with Sister Yanping (Wang Yanping). He doesn't have a decent stance but only cares about the money.

# https://twitter.com/sinofreedom/status/905465344197746689





雁平伐马。雁:我很爱马妹妹,她是个很单纯的孩子,马:你助纣为虐,把我监禁在公寓中。雁:她性格内向,可能有忧郁症。马:你把我手机抢走,威逼我不报警。雁:网上传的肝谓王雁平与马蕊对话录音全部是假的,马:你以为可以欺骗一些人,也可以欺骗一段时间,但是你不可能永远欺骗所有人。



变态辣椒 @remanwangxt 影后

Translate Tweet

9:18 AM - 6 Sep 2017

# Yanping's war against Ma (Rui).

Yan: I love sister Ma very much, she is a very innocent kid.

Ma: You helped bad people to victimize the weak and detained me in the apartment.

Yan: She is introverted and may suffer depression.

Ma: You grabbed my cellphone and forced me not to call the police.

Yan: All the so-called conversation recordings between Wang Yanping and Ma Rui on the internet are fake.

Ma: You may think that you can deceive some people, and you can deceive them for some period of time, but you will never be able to deceive everyone forever.

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# **EXHIBIT B**

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NYSCEF: 08/26/2019

#### **AFFIDAVIT**

STATE OF NEW YORK	)
	) ss:
COUNTY OF QUEENS	)

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# <u>VIDEOS + TWEETS</u>

#### 1. A conversation between Xi Nuo and Xia Yeliang

西諾: 于泳亲自告诉我, 说最最可怜的是郭美。

Xi Nuo: Yu Yong told me in person stating the most miserable person is Guo Mei.

夏业良:郭美住院的时候于泳陪着她呢是吧。另外还有他的儿子郭强好像也被他搞的……

Xia Yeliang: While Guo Mei (Miles Kwok's daughter) was admitted in the hospital, she was accompanied By Yu Yong, wasn't she? Also, it seems like his son Mileson Kwok was also messed up by him...

西诺: 郭强的,就变成趴灰了呀。郭强的女朋友是一个很漂亮的模特,郭文贵趁着郭强出差的时候对她进行性侵了。

Xi Nuo: Mileson Kwok has become such a pitiable weak man. Mileson Kwok's girlfriend is a very beautiful model. Guo Wengui sexually assaulted her when Mileson Kwok went on a business trip.

夏业良:人家说他乱伦……

Xia Yeliang: People said he committed incest...

西诺: 乱伦指的是王雁平。

Xi Nuo: The one who was involved in the incest is Wang Yanping.

夏业良: 王雁平是他侄子的老婆。

Xia Yeliang: Wang Yanping is his (Guo Wengui's) nephew's wife.

西诺: 侄媳妇。所以就是这么说的。这个人下三滥,兔子也不吃窝边草啊。

Xi Nuo: Nephew's wife. That's why he was called a rotten piece of shit. Even the rabbit won't taste the grass in or around its cage.

夏业良:而且他经常骂郭强,他录音里……

Xia Yeliang: Also, he often scolded Mileson Kwok, in the recordings, he...

西诺: 骂他是无能。郭强也是厌恶这个爹。为什么呢? 你想想,哪个做爹的能把女儿儿子推到犯罪的第一线。你看看香港的那个案子里面,头一个起诉的不是郭文贵,是他女儿,还有他儿子。

Xi Nuo: Scolded him for incompetence. Mileson Kwok also despised this dad. Why? Just think, what kind of dad could push his own daughter and son to the frontline of the crimes? Check out the cases in Hong Kong--the first person to be sued is never Guo Wengui, but always his daughter and his son.

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夏业良:这样把他儿女都害了。虎毒不食子呀。

Xia Yeliang: That's how his children got ruined. Even the fierce tiger won't bite on its own cubs (Chinese idiom: everyone loves their own children).

西诺:我们都是有孩子,都是鼓励他做正当的事情,不做违法的事。然后 我觉得你们安徽胡适老家的人都是重视教育。

Xi Nuo: We all have children. We encourage them to do proper things, but not illegal things. And I think people in An Hui—the hometown of Hushi (Province in Eastern China) all value the education very much.

夏业良:郭害了他家里多少人?他的八弟,因为当时警察抓捕,拘捕 Xia Yeliang: How many members in Guo's family have been ruined by him? His eighth brother, when police made the arrest at that time...

西诺: 郭文贵当时干了件什么事情,他掐住那个警察的脖子,他弟弟一看,我哥能掐住脖子,那我不就拿菜刀砍嘛。

Xi Nuo: What Guo Wengui did at that time is that he grabbed the police officer's neck. When his younger brother saw that his big brother could grab the officer's neck, he brandished a kitchen knife and hacked!

夏业良:结果警察一枪就打死了。

Xia Yeliang: So he was killed by the police with a single shot.

# 2. <a href="https://youtu.be/hPtBIwQPOHA">https://youtu.be/hPtBIwQPOHA</a> (2:37-3:35)

#### 寶勝傳媒 GBSMedia

有关上午庭审的场景。

今天早上一共对三位证人进行咨询。

第一位出席的就是王雁平,王雁平今天穿了一身素装,打扮也蛮精神的。 律师问她的问题,你是代表谁,你为谁工作。

她说从 2009 年开始我就为 Guo Family 服务。她说我的服务对象是他们家 庭的 100 多人。

另外她说我工作主要是为这个家庭搜集资料,准备资料,准备文件。其他 的我做不了主。她的意思就是这些事情跟我没有关系。

律师又问她,XXX 离岸公司参与这个楼的购买你知不知情,她说我不知道。但是律师又拿着一堆文件说,你签署了这些文件,你难道不知道吗?

她就支支吾吾,她说我 Super nervous,我太紧张了,我已经忘掉了这些事情。请你原谅。这就看出来,她在这些面前是撒了谎。

FILED: NEW YORK COUNTY CLERK 08/26/2019 06:37 PM INDEX NO. 157786/2019

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#### Xi Nuo:

So I will tell you guys about the situation of the trial this morning. There were three witnesses being examined in the morning and the first one who testified was Wang Yanping. She wore plain clothes today and looked like she was in pretty good spirits. She was asked by the counsel whom she was representing and whom she worked for. She said she started working for the Guo family in 2009, and she worked for around 100 people in the family. Also, she said her main duty is to conduct research, prepare materials and documents for this family. She did not have the final say on other matters. What she meant was that she has nothing to do with these matters. The counsel then asked her if she knew about the purchase of this building by XXX, the off-shore company. She replied she didn't know. Yet, the counsel held a pile of papers and said, "You signed all these papers, but you knew nothing about these?" She then stammered and said she was super nervous, she had already forgotten these matters and please pardon her. So, it was obvious that she had lied on these matters.

#### 3. Tweet: (2017/9/5)

https://twitter.com/sinofreedom/status/905275978448080898





今天露面的王雁平声音与以往录音差不多。应该肯定是真实的王雁平。今天王雁平矢口否认推上公布的她与郭文贵啪啪啪的录音,她甚至完全否认她与马蕊的对话录音,她对郭文贵涉嫌强奸闭口不言。她强调自己是有18年党龄的共党,她对郭的爆料持支持立场。采访日期不明,为何不在郭府,明镜没有交代。

下午8:46 - 2017年9月5日

#### Xi Nuo:

Wang Yanping showed up today and her voice is similar to that of hers in past recordings. It should be confirmed that it is the real Wang Yanping. Wang Yanping denied today that the recording of her having sex with Guo Wengui published on Twitter was true. She even totally denied the recorded conversation between her and Ma Rui was true. She did not comment at all on the alleged rape Guo Wengui involved. She emphasized that she had been a CCP member for 18 years. She had expressed support for Guo's disclosing effort. The date of the interview is unclear, Der Spiegel did not explain why it was not held in Guo's residence.

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# **EXHIBIT C**

FILED: NEW YORK COUNTY CLERK 08/26/2019 06:37 PM

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	) ss:
COUNTY OF QUEENS	)

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YSCEF DOC. NO. 1238 1:23-Cr-00118-AT Document 81-21 Filed 06/05/23 Page 51 of 120
RECEIVED NYSCEF: 08/26/2019

# Xi Nuo's tweets



https://twitter.com/sinofreedom/status/1152590907306336256?s=20

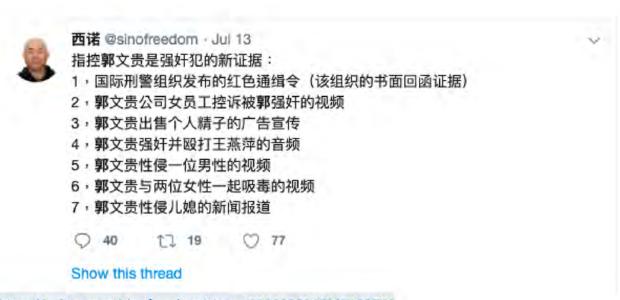
Only when Wang Yanping and Han Chunguang report on Guo Wengui can they save themselves.

Tang Han tweeted: According to SV719 counterclaim, Wang Yanping signed the contract in this case with a smile on her face on 01/06/2018 right in front of Mrs. Wallop. Mrs. Wallop doesn't read Chinese characters. Wang Yanping didn't mention that the Chinese name she signed isn't her name, but Chinese character "Han Chunguang". The signature on this contract is "Han Chunguang", of course this signature is different from what Han has signed on other documents. One can tell the difference if he observes it carefully in details. Wang Yanping fabricated the signature. Who gave her this gut?



https://twitter.com/sinofreedom/status/1150547791808270338?s=20

Wang Yanping called herself as "I Wang Yanping" (0:16), Guo Wengui said "Ah, Yanping" in a dearly tone (0:33). The two of them publicly admitted their identities voluntarily.



https://twitter.com/sinofreedom/status/1150006947397152768

New evidences that support Guo Wengui as a suspect of rape are:

- 1. The red wanted fugitive warrant issued by the Interpol (Proof of a written reply from the organization)
- 2. The video clip of Guo Wengui's female employee claiming that she was raped by Guo Wengui
- 3. The advertisement about Guo Wengui selling his personal sperms

- 4. The audio clip of Guo Wengui raping and assaulting Wang Yanping
- 5. The video clip of Guo Wengui sexually assaulting a man
- 6. The video clip of Guo Wengui taking drugs with two women
- 7. The news report about Guo Wengui sexually assaulting his daughter-in-law



西诺 @sinofreedom · Jul 13 4,郭文贵性侵并殴打王燕萍

youtu.be/dGppXFlktxc?li...

Published by:华人频道 Published on Sep 9 2017



盘古老板郭文贵和女秘书王雁平办公室啪啪啪第八季 盘古老板郭文贵和女秘书王雁平办公室啪啪啪第八季 youtube.com

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Show this thread

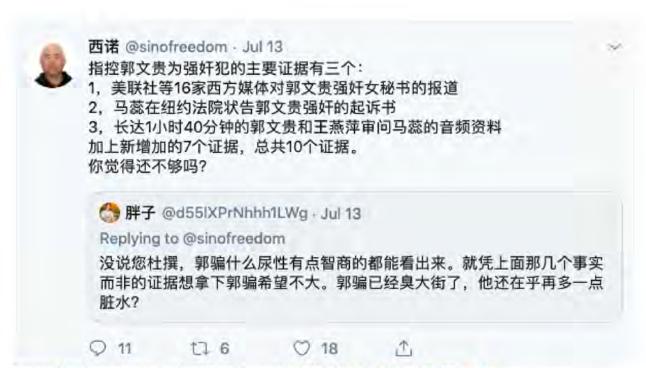
https://twitter.com/sinofreedom/status/1150055175958216710

4. Guo Wengui sexually assaulted and beat Wang Yanping

Published by: Chinese Channel

Pangu Boss Guo Wengui having sex with female secretary Wang Yanping in office (Season 8)

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#### https://twitter.com/sinofreedom/status/1150143904102174720?s=20

There are 3 main pieces of evidence that support the charge against Guo Wengui as a rapist:

- 16 western media companies including Associated Press reporting about Guo Wengui raping a female secretary
- 2. The legal complaint filed by Ma Rui in the New York Court, accusing Guo Wengui raping her
- The one-hour-forty-minute audio clip of Guo Wengui and Wang Yanping interrogating Ma Rui

Along with the 7 pieces of newly added evidence, there are a total of 10 pieces of evidence. Do you still think it isn't enough?



#### 西诺 @sinofreedom - Jul 11

我在大陆生活期间,很少听到有亿万富翁强奸女性事情。富人通常用钱来换 取女性的青睐,强奸既危险又失体面,传出去对富人面子不利。商界也会瞧 不起靠强奸女人来充斥后宫的二癞子。但是让我确信郭文贵犯有强奸罪行的 就是那份录音,其中的声音就是郭文贵和王雁平。这很难作假。

### 西诺 @sinofreedom - Jul 11

# Replying to @abcyyy5119199 and @gloriousgobid

认知郭文贵有一个过程。在撰写北大方正股权之争时我向北京朋友了解 郭,他们说郭是个流氓,他多次强奸公司女员工,我不太相信一个亿万富 翁会干这等下流事。后期报道中我从未提及郭强奸女员工一事。后来网上 录音出来我有点半信半疑,直到美联社报道郭文贵强奸女秘书马蕊,我才 确信郭强奸是确有其事。

Q 5

17 1

0 11



### https://twitter.com/sinofreedom/status/1149417419187863552?s=20

I seldom heard about billionaires raping women when I was living in mainland China. The rich people usually used money to win the hearts of women, as raping not only is dangerous, it also makes one person lose his social status. Once it is discovered, the rich man will lose face. The business world also looks down on those low class guys who rely on raping women to expand the number of women they own. But what convinces me that Guo Wengui committed rape is that audio recording. That is the voice of Guo Wengui and Wang Ping. It is hard to fabricate.



#### 西诺 @sinofreedom - Jul 11

我认为我的辩解足以打动法官和陪审团。因为我的个人认知(personal knowledge)是建立在如下的基础:

- 1,我与王燕萍和郭文贵有多次面对面接触,熟悉他们的声音。
- 2,我有澳洲和加拿大声纹鉴定机构的检测报告
- 3,我有美联社对郭文贵强奸马蕊的报道。

#### 西诺 @sinofreedom

如果法官问我,你如何认定王燕萍郭文贵审问马蕊的音频是真的? 我的回答:我与郭文贵有三次面对面接触,我与王燕萍有一次面对面的接触。 我非常熟悉他俩的声音和语调,同时我有澳洲和加拿大声纹鉴定机构的检测报 告。美联社的报道佐证了部分事实。...

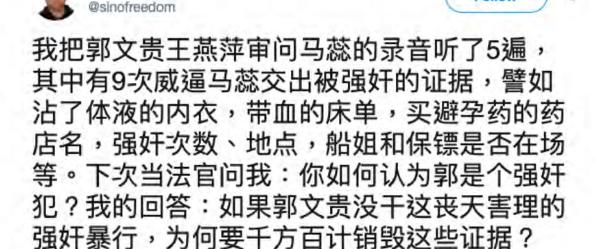
# https://twitter.com/sinofreedom/status/1149309155716603904

I believe my argument is enough to convince the judge and the jury because my personal knowledge is established based on the following:

- I have had a lot of face-to-face contacts with Wang Yanping and Guo Wengui. I am familiar with their voices.
- I have the assessment reports from the Australian and Canadian voiceprint identification companies.

Follow

3. I have Associated Press's published report on Guo Wengui raping Ma Rui.





https://twitter.com/sinofreedom/status/1149292519206899712

I have listened to the recording of Guo Wengui and Wangyanping's interrogation on Ma Rui 5 times. There are 9 occasions where Ma Rui was coerced to hand over the evidences of being raped, for example, the underwear contaminated by bodily fluid, the blood-stained bed sheet, the name of the pharmacy for getting birth-control pills, the number of times of being raped, the locations of the offenses and whether or not the boat staff and security guards were present etc. If the judge asks me next time why I think Guo is a rapist, I will reply, "If Guo Wengui didn't commit such an outrageous rape, why would he need to use every means to destroy these evidences?"

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如果法官问我,你如何认定王燕萍郭文贵审问 马蕊的音频是真的?

我的回答:我与郭文贵有三次面对面接触,我 与王燕萍有一次面对面的接触。我非常熟悉他 俩的声音和语调,同时我有澳洲和加拿大声纹 鉴定机构的检测报告。美联社的报道佐证了部 分事实。

因此,我确信王燕萍郭文贵审问马蕊的音频资料是真实的。

#### 美音 @SBguang\_guang

之所以我们和蚂蚁帮不同,甚至是高一等级的生物,在于我们有人的正常的逻辑思维。 郭文贵最在意的就是自己的形象,被人指控强奸怎么就容忍了呢,没有做过任何澄清的 努力,比如反诉,比如去鉴定录音凭证为假等,足以证明极度心生畏惧。有起诉几十个 不相干人的劲头,为什么对马蕊案讳莫如深? twitter.com/sinofreedom/st...



https://twitter.com/sinofreedom/status/1149302168542941185

If the judge asks me, "How can you confirm that the audio clip about Wang Yanping and Guo Wengui interrogating Ma Rui is real?"

My reply will be, "I have had face-to-face contacts with Guo Wengui on three occasions, while I have once with Wang Yanping. I am very familiar with their voices and intonations. Also, I have the analysis reports from Australian and Canadian voiceprint identification companies. The report published by Associated Press has also corroborated with part of the facts. Therefore, I believe that the audio clip about Wang Yanping and Guo Wengui interrogating Ma Rui is real."

INDEX NO. 157786/2019 COUNTY



# 西诺 @sinofreedom · Jun 25

郭骗诉夏业良一案,郭本来提供了几个证人,在最后截至期时候他撤出所有 证人,只有他一个人,即当原告又当证人。他连跟着他多年的王燕萍也不会 信任,生怕会突然变故。得道多助 失道寡助,一个廉耻寡信的恶棍总会孤独 地走向灭亡!

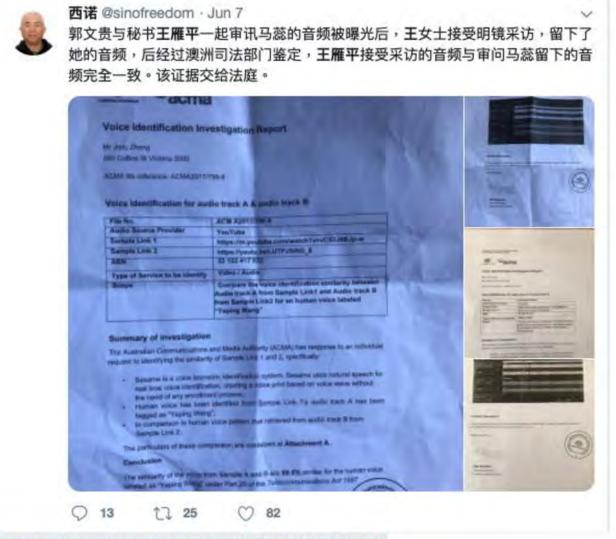
1 0 11 17 13 0 77

#### https://twitter.com/sinofreedom/status/1143470027494109184?s=20

In the case of Liar Guo suing Xia Yeliang, Guo originally had several witnesses, but he withdrew all the witnesses at the very last minute. Eventually it ended up with him being alone as the plaintiff and the only witness. He didn't even trust Wang Yanping who followed him for so many years, worrying that there might be unexpected things coming up. When a person is in right path, there are more helps available to him; otherwise, none awaits him ahead. A thug who has no shame and trustworthiness will eventually head to the path of demise alone.

FILED: NEW YORK COUNTY CLERK 08/26/2019 06:37 PM NYSCEF DOC. NO. 12/28 1:23-cr-00118-AT Document 81-21 Filed 06/05/23 INDEX NO. 157786/2019

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https://twitter.com/sinofreedom/status/1137014570034352129

Since the exposure of the audio clip about Guo Wengui and his secretary Wang Yanping interrogating Ma Rui together, Ms. Wang accepted the interview from Der Spiegel, leaving recorded proof of her voice. After verification from the Australian judicial authorities, the audio clip of Wang Yanping having an interview with Der Spiegel is the same as the audio clip of her interrogating Ma Rui. This evidence has already been submitted to the court.

YSCEF DOC. NO. 1286 1.23-CT-00118-AT DOCUMENT 81-21 Filed 06/05/23 Page 60 of 120 RECEIVED NYSCEF: 08/26/20



#### 西诺 @sinofreedom · May 23

下次见到王燕萍必须问的问题:法庭文件显示你和韩联潮向SV公司提供了96人的调查名单,请问该合同的签字人是不是你?你在东利公司中担任什么职务?你调查这96人的目的是什么?100万的调查经费哪里来的?以什么方法汇入美国?这笔钱与郭文贵的香港洗钱案有什么关系?

Q 7 1 1 0 23

#### https://twitter.com/sinofreedom/status/1131517968452599810

Next time when (I) see Wang Yanping, (I) must ask her the following questions: Court papers show that you and Han Lianchao gave Strategic Vision a list of 96-people to be investigated. Are you the one who signed that contract? What was your position in Eastern Profit? What is the purpose of you investigating these 96 people? Where did the \$1,000,000 investigation fee come from? In what way was the money transferred to the States? How is this amount of money related to the Guo Wengui's money laundering case in Hong Kong?



#### 西诺 @sinofreedom + May 12

有一次**郭**文贵喝醉酒后对王燕萍施暴,他不仅强奸王,而且用脚在她的肚子上猛烈 地踩踏。这段录音网上有记录。当时好像瓦利也在场。

#### 西诺 @sinofreedom

我对王燕萍讲,你跟着郭文贵没有任何出路。郭对朋友从来就没有一丁点的忠诚度,能有价值就利用,无价值就像丢抹布一样抛弃。我希望她能去纽约警局报警,控告郭文贵强奸和殴打她本人。这一招必能反败为胜。 twitter.com/TangHan3296711...

Q 37 t] 5 0 23

#### https://twitter.com/sinofreedom/status/1127557203844640768

There was an occasion where Guo Wengui assaulted Wang Yanping after he got drunk. Not only did he rape Wang, he also stepped on her belly violently. There was a recording of this audio clip online. It seems that Wa Li was there at that time too.

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### 西诺 @sinofreedom · May 12

我对王燕萍讲,你跟着**郭**文贵没有任何出路。**郭**对朋友从来就没有一丁点的忠诚 度,能有价值就利用,无价值就像丢抹布一样抛弃。我希望她能去纽约警局报警, 控告郭文贵强奸和殴打她本人。这一招必能反败为胜。



# 唐汉 @TangHan32967114

母亲节特别专辑

"当我离开中国时,我的儿子是一岁五个月, 现在他差不多 六岁,该上学了。"...

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### https://twitter.com/sinofreedom/status/1127557203844640768

I told Wang Yanping that you have no future if you follow Guo Wengui. Guo never has any loyalty to his friends. He uses people when they have value to him and he throws them away like a piece of cleaning shred if they have lost their value to him. I hope that she can report to the NYPD accusing Guo Wengui raping and assaulting her. This action will turn her situation from losing to winning



# 西诺 @sinofreedom · May 5

有关郭文贵诉叶宁等三人案子, 我在PAX庭审前问过王燕平, 我说: 据郭 宝胜介绍,这份合同是你王燕平起草,交给郭宝胜和赵岩。王燕平回答:她 说不知情, 一切都是郭文贵安排。看来郭用一个假合同测试拥趸的忠诚度, 如果穿帮,就将拥趸告上法庭。据了解,该合同是取证西诺性侵,郭文贵提 供数百万调查费用



# ● 唐汉 @TangHan32967114 · May 5

叶宁称: 所谓的协议与事实皆不存在,郭文贵的滥诉应当受到严厉惩戒。 郭文贵起诉叶宁的目的在于报复,因为叶宁出于公益代理了西诺夏业良和 郭宝胜的案子,使他们摆脱没有律师费的困境。而且,叶宁还是一位中国 顶级权利家族的逃亡人士的主辩律师,郭文贵曾斥巨资协助北京追查这位 政治敏感的人士的下落。

Show this thread

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# https://twitter.com/sinofreedom/status/1125057498476679170?s=20

About the case of Guo Wengui suing the three people including Ye Ling, I have asked Wang Yanping before the PAX trial. I said, "According to Guo Baosheng, this contract was drafted by you Wang Yanping, and handed over to Guo Baosheng and Zhao Yan." Wang Yanping replied

that she didn't know and everything had been arranged by Guo Wengui. It looks like Guo Wengui was using a fake contract to test the loyalty of his followers. If the truth was found out, he would sue the followers in court. It has been understood that the contract was designed to get evidence of sexual assault against Xi Nuo, and Guo Wengui has offered several million dollars for the investigation.



#### 西诺 @sinofreedom - Apr 30

我的确向王燕苹提出和解。只要郭写书面保证,保证今后不再:强奸女秘书,洗钱,当中共特务,吹牛逼,炫富,说脏话,诈骗。有此保证书,我与他的过节一笔勾销。燕萍回去后给郭汇报:郭总,西诺提出要和解,他向你写保证书,保证今后不再强奸女秘书。郭勃然大怒;他有钱请得起女秘书吗?燕萍:领导英明!

Q 9 11 4 0 50

https://twitter.com/sinofreedom/status/1123204023472001024

I did propose a settlement with Wang Yanping. As long as Guo gave a written statement that he would not rape female secretaries again, not commit money laundering, not to be a spy for CCP, not to boast and show off his wealth, and not to speak foul language and defraud others in the future, all the discord between him and me can be forgotten. Yanping relayed this to Guo when she went back, "Boss Guo, Xi Nuo proposed a settlement, he asked for a guarantee that you are not going to rape female secretaries in the future." Guo got angry immediately, "Does he have money to hire female secretaries?" Yanping replied, "Smart Boss!"



西诺 @sinofreedom - Apr 28

王燕萍要想自救,唯一的办法就是去警局报案,举报某人性侵。证据很简单,网上一大堆音频信息。到这个份上,还要顾及脸面,那就太愚蠢了。

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https://twitter.com/sinofreedom/status/1122386442473410560?s=20

If Wang Yanping wants to save her own ass, the only way is to file a report in the police station, accusing someone for sexual assault. The evidence is very easy and simple, there are a lot of audio clips online. If she still cares about losing her face in public at this point, she is too stupid.



西诺 @sinofreedom - Apr 28

我在与王燕萍交谈中谈到一个逻辑问题:A非C,B非C,请问A等于B?燕萍 脸茫然。我继续解释,老共反郭,西诺反郭,请问老共等于西诺吗? 燕萍不吱 声。我再解释,我讨厌吃花椰菜,布什总统也讨厌吃花椰菜,西诺等于布 什。燕萍笑了。

Show this thread

https://twitter.com/sinofreedom/status/1122494284777820162?s=20

I raised a logic question when I was having a conversation with Wang Yangpng, "A is not C, B is not C, then is A the same as B?" Yanping looked confused. I continued explaining, "Old CCP is against Guo, Xi Nuo is against Guo, then is Old CCP the same as Xi Nuo?" Yanping stayed silent. I continued explaining, "I hate eating cauliflowers, President Bush also hated eating cauliflowers, Xi Nuo is the same as President Bush." Yanping laughed.



#### 西诺 @sinofreedom · Apr 27

昨天我最后与王燕萍分手的时候说:燕萍啊,不要再折腾了,回家去和丈夫孩子团 聚,老郭靠不住的。燕萍没搭话,看得出来,她是有苦无处说。也是个苦命的孩 子。一时糊涂啊!

#### https://twitter.com/sinofreedom/status/1122345021829713920

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When I said goodbye to Wang Yanping yesterday, I said, "Yanping, stop giving yourself a hard time, go back home and be reunited with your husband and children, old Guo is unreliable." Yanping didn't respond, but I could tell she had her concerns and dilemma with no one to confide with. She is also a unfortunate kid. Lost her sense at one point!



#### 西诺 @sinofreedom - Apr 26

今天居然偶遇王燕平,她主动与我打招呼,我们也是老熟人了。我与她交谈了大约 10几分钟,谈到了她的工作,家庭,以及已经开始的诉讼,我们彼此熟悉的人士。 王女士看上去愁容满面,而且头发也没有很好梳理。她脸色有些浮肿,我知道她已 经几年没有见到丈夫和孩子。今天她做完证后,与郭打了个招呼就走了。

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https://twitter.com/sinofreedom/status/1121897117604360192

To my surprise, I bumped into Wang Yanping today. She took the initiative to say hi to me. We were old acquaintances. I chatted with her for around 10 minutes. We talked about her work, her

family and the ongoing lawsuits. We also talked about the people whom we are both familiar with. Ms. Wang had sadness all over her face. She didn't comb her hair properly, and her face looked a bit swollen. I know she hasn't been seeing her husband and children for several years. After she gave her testimony today, (she) simply said hi to Guo and then left.



## 西诺 @sinofreedom · Apr 1

根据王艳平留下的音频证据,我们在澳洲和加拿大同时做了两份独立的声纹 分析。分析结果显示,王艳平接受明镜采访的音频与王艳平审问马蕊的录音 音频高度相似。



### 西诺 @sinofreedom - Apr 1

记得我听到王艳平审问马蕊的录音后,我就与陈小平私信,我说王艳平是 从此不再出镜了。陈说他会争取采访王。我公开打赌200美元,断言王不 会出镜。陈笑我会输的很惨。最终小平赢了,艳平留下了我期待的声纹。 张竹先生说我赢了,还请我吃顿饭。愿赌服输,我200美刀支票放在身 边, 小平你随时可以来取!

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### https://twitter.com/sinofreedom/status/1112769113276010496?s=20

Based on the audio evidence that Wang Yanping left, we conducted two separate and independent voiceprint analyses in Australia and Canada at the same time. The analysis results show that, the audio file of Wang Yanping having an interview with Der Spiegel is highly similar to the voice recording of Wang Yanping interrogating Ma Rui.



#### 西诺 @sinofreedom · Feb 21

2018年1月你指挥王燕平与T&M 公司签约,继续跟踪令完成。请问这笔合同 的费用是否也是来自你的借款? 谁能借款给你搞特务行动?

Show this thread

https://twitter.com/sinofreedom/status/1098650135649796097?s=20

You directed Wang Yanping to sign the contract with T&M company in Jan 2018 and continue to follow Ling Wancheng. Was the cost for this contract from your loan as well? Who will lend money to you for your spy operation?



# 西诺 @sinofreedom · Jan 18

据悉,负责郭文贵诉讼夏业良与李洪宽的律师丹尼尔.瓦德已经申请辞职,丹 尼尔在给法庭的信中提供了郭文贵的确认信,令人惊奇的是郭的签名居然是 王燕平的签字笔迹。这在美国的诉讼案中极其罕见。正式的做法应该有公证 人的盖章和签字。郭骗子难道2美元的公证费也要省吗?这个村骗真是蠢不可 耐!

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### https://twitter.com/sinofreedom/status/1086445157724160000?s=20

It has been learned that the counsel Daniel Watt who is retained by Guo Wengui for a lawsuit against Xia Yeliang and Li Hongkuan has already applied for withdrawal. What is surprising is that in Guo Wengui's confirmation letter that Daniel submitted to the court is actually signed in Yanping's handwriting. This is very rare in a US lawsuit. The proper way of doing this should be having a notary's stamp and signature. Does Liar Guo even want to save 2 dollars in notary fee? This liar is really stupid!



#### 西诺 @sinofreedom - Jan 14

我记得当时是与陈小平打赌,如果王燕平出镜接受访问,我就赔你小平200美 刀。结果我输了,王燕平不仅出镜,还承认是18年党龄的老同志。后来我偶 遇陈小平要付给他200美刀打赌输的钱。陈小平眼睛瞪了我一眼扭头就走了。 其实我没有恶意,200美刀换来一个真人的声音,后来拿到加拿大做分析, RPG的录音不假!



对郭骗有兴趣深入了解的网友都应仔细阅读这8篇爆料文章: 自称王雁平 推特号大爆郭文贵内幕(一) - 中国禁闻网 bannedbook.org/bnews/guowengu...

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#### https://twitter.com/sinofreedom/status/1084830790888968193?s=20

I remember I made a bet with Chen Xiaoping at that time, saying if Wang Yanping appeared on camera for an interview again, I would give him USD 200. In the end, I lost the bet. Not only did Wang Yanping appear on camera, she also admitted she had been a CCP member for 18 years. I then offered to give Chen Xiaoping the USD 200 that I lost in the bet when I encountered him later on. Chen Xiaoping just stared at me and then left. However, I had no bad intents (I) spent USD 200 in exchange for an authentic voice. I then sent the voice to Canada for an analysis. The recording released by RPG (a twitter account) isn't fake!



# 西诺 @sinofreedom - Dec 13, 2018

昨天郭文贵发现皮鞋前掌磨破了,他问王艳萍: 我好好的5万美刀一双皮鞋没 穿几天就破了,啥原因? 艳萍: 郭总, 你这几天踮脚太频繁了。郭: 我这踮 脚也不是一时半会儿,以前鞋没破,咋的现在会破了?艳萍:郭总,好好的 一双鞋你非的刷上三色油漆,这牛皮(逼)不就穿帮了?郭:莘县阳谷县搭 县,有道理。

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#### https://twitter.com/sinofreedom/status/1073394544962617344?s=20

Guo Wengui found that the front part of his shoe was worn yesterday. He asked Wang Yanping, "This pair of leather shoes cost me USD 50,000, I have worn them for just a few days and they were torn! What's happened?" Yanping replied, "Boss Guo, you tiptoed too much these days." Guo said, "I have been tip-toeing for quite some time, my shoes weren't torn back then. Why would they be torn now?" Yanping said, "Boss Guo, you insisted on putting three layers of paint on a good pair of shoes, isn't that how the cow leather get torn?" Guo then said, "Whatever you say, it makes sense."



### 西诺 @sinofreedom - Nov 2, 2018

黄河边播报发出公告,今天美西时间8点将公布一件事情,说是郭身边最后 名女幸心腹背叛其主,不辞而别。不晓得这位女士是不是王燕平? 她可是阿 贵最为放心的大内管,如果燕平出走,郭的大厦顷刻塌了半边。看看跟随郭 骗的屈国娇,于泳,杨鑫鑫,马蕊,王燕平,哪一个不是被郭畜生凌辱到遍 体鳞伤?

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# https://twitter.com/sinofreedom/status/1058513693280030721?s=20

Huang Hebian issued a public notice that there would be an announcement at PST 8 o'clock regarding the last and trusted female subordinate of Guo betrayed him and left him without a notice. Wondering if this lady is Wang Yanping. She is the steward that Guo trusted the most. If Yanping left, Guo's world will collapse in half. Take a look at the people who followed Liar Guo-- Qu Guojiao, Yu Yong, Yang Xinxin, Ma Rui and Wang Yanping. Are there any of them who are not tortured and abused with the wound all over their bodies by Animal Guo?

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# **EXHIBIT D**

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RECEIVED NYSCEF: 08/26/2019

#### **AFFIDAVIT**

STATE OF NEW YORK ) ss:
COUNTY OF QUEENS )

I, Shenyi Glass, am a linguist hired by TransPerfect, a translation services that operates under both ISO 9001:2008 and EN 15038:2006 certification. I have been speaking Chinese dialect of Mandarin for 50 years. I am a recipient of the Certificates for the New York State Court Interpreter and the National Healthcare Interpreter. I have studied the Chinese translation for 5 years.

The following document is, to the best of my knowledge and belief a true and accurate translation from Chinese into English:

The Attached Social Media Posts

TransPerfect Translations, Inc., a translation organization with over 90 offices on six continents, is a leader in professional translations. TransPerfect Translations, Inc. has over twenty years experience translating into the above language pair, its work being accepted by business organizations, governmental authorities and courts throughout the United States and internationally.

TransPerfect Translations, Inc. affirms that the provided translation was produced in according to our ISO 9001:2015 and ISO 17100:2015 certified quality management system, and also that the agents responsible for said translation(s) are qualified to translate and review documents for the above language pair, and are not a relation to any of the parties named in the source document(s).

08/20/2019

Sworn to before me this Monday, August 19, 2019

Shenyi Glass

Interpreter & Translator

Signature, Notary Public

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NOTARY PUBLIC-STATE OF NEW YORK
No. 01SH6352366
Qualified In Queens County
My Commission Expires 12-27-2020

Stamp, Notary Public

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# 夏业良 Xia Yeliang

https://twitter.com/XiaYeliang/status/1105174362498441216



Replying to @TangHan32967114

郭骗在与李友的通话录音中说自己已与李友的情人上过三次床,郭骗与王雁平通奸的录音多达6段以上,这些证据在网上很容易就能搜索到。

11:31 AM - 11 Mar 2019 from Virginia, USA



Liar Guo said in the audio recordings of his conversations with Li, You that he had slept with Li, You's lover for three times. There are as many as six recordings of Liar Guo and Wang, Yanping committing adultery. These evidences can be easily searched online.

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# https://twitter.com/XiaYeliang/status/1104594544056778753





王平(王雁平?)=郭文贵?他们是什么关系?是主仆/夫妻还是情人关系?需要由当事人签字的法律文件却由一个雇员签署,谁来承担法律责任?如18楼被抵押,郭骗与王雁平相互推诿都不认账



唐汉 @TangHan32967114

郭夏案 郭文贵的前任律师在2019/1/17提交法庭的"王平"签字的郭文 贵的同意书:

我发誓, 我已年满18岁, 我有行为能力、知晓相关事实, 我是...

Show this thread

8:07 PM - 9 Mar 2019 from Virginia, USA

Wang, Ping (Wang, Yanping?) = Guo, Wengui? What kind of relationship do they have? Master and servant / husband and wife, or lovers? A legal document that shall be signed by the party was signed by an employee instead. Who is going to take the legal responsibility? If 18/F is held in pledge, Liar Guo and Wang, Yanping will pass the buck and decline the responsibility.

# https://twitter.com/XiaYeliang/status/923748808600838144

Replying to @Vanessa ZhangUK @ZhMinYH

自己就是这样身体力行的,



Guo Wengui himself practices what he preaches in this way. He claimed that he slept with Li, You's lover; he committed adultery with Wang, Yanping who has a husband; he threatened and forcibly seized others' corporate assets, on and on, you name it.

# https://twitter.com/XiaYeliang/status/1084670470002262016



8:36 PM - 13 Jan 2019 from Virginia, USA

AT the end of June 2017, someone came to argue with me saying the audio recording about Liar Guo was a fake, since current technology could synthesize anyone's voices in the conversation. The result would be good enough to disguise the genuine from the fake. I challenged him and said, please make a half-hour audio recording of me talking with Wang, Yanping while we are having sex, then compare with Guo and Wang's recordings. Are you able to fake it as good as the real? 1.5 years has already passed, where are the idiot fans of Guo, all die out?

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# https://twitter.com/XiaYeliang/status/1084665987411120128



Replying to @cruciansaint @zhao93

吃瓜群众就不必自作多情地把自己当成郭家人了。郭骗与王雁平啪啪啪录音曝光后那么多脑残郭粉都说是假的,结果王雁平接受明镜采访时的声音和笑声都完全相符。郭与何频通话录音也有蠢货说是假的,你能找出第二个人能发出何总的特殊发音与鼾声吗?蠢货们都闭嘴

8:18 PM - 13 Jan 2019 from Virginia, USA



Those ordinary masses can stop imagining themselves as Guo's people. When the audio recording of Liar Guo and Wang, Yanping having sex was released, a lot of Guo's stupid fans said that it was a fake. Eventually it matched perfectly with Wang Yanping's voice and laughter in her interview with Ming Jing. Some idiots also said that the audio recording of Guo and He's conversation was fake too. Can you find another person who can make that kind of special pronunciation and snoring as President Ho does (He Pin-Founder of Ming Jing)? Shut up idiots!

TILED: NEW YORK COUNTY CLERK 08/26/2019 06:37 PM INDEX NO. 157786/2019

https://twitter.com/XiaYeliang/status/901169343769214976





Replying to @RuL\_RPG @KwokMiles and 6 others

这王雁平也算是死心塌地效忠于郭了,最后竟 然还是被抛弃了。郭没有人性,只有兽性。对 自己的妻子和儿女都是如此.....

12:48 PM - 25 Aug 2017

It can be said that this Wang Yanping has unswerving loyalty to Guo. However she was still abandoned in the end. Guo is of no humanity, but of beastliness. He treats his wife, son and daughter in the same way...

FILED: NEW YORK COUNTY CLERK 08/26/2019 06:37 PM
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NYSCEF: 08/26/2019

# **EXHIBIT E**

FILED: NEW YORK COUNTY CLERK 08/26/2019 06:37 PM

NYSCEF DOC. NO. 1280 1:23-cr-00118-AT Document 81-21 Filed 06/05/23 Page 75 of 120
RECEIVED NYSCEF: 08/26/2019

#### **AFFIDAVIT**

STATE OF NEW YORK	)
	) ss:
COUNTY OF QUEENS	)

I, Shenyi Glass, am a linguist hired by TransPerfect, a translation services that operates under both ISO 9001:2008 and EN 15038:2006 certification. I have been speaking Chinese dialect of Mandarin for 50 years. I am a recipient of the Certificates for the New York State Court Interpreter and the National Healthcare Interpreter. I have studied the Chinese translation for 5 years.

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The Attached Social Media Posts

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TransPerfect Translations, Inc. affirms that the provided translation was produced in according to our ISO 9001:2015 and ISO 17100:2015 certified quality management system, and also that the agents responsible for said translation(s) are qualified to translate and review documents for the above language pair, and are not a relation to any of the parties named in the source document(s).

Shepiden 08/20/2019

Sworn to before me this Monday, August 19, 2019

Interpreter & Translator

Signature, Notary Public

FRANCIS SHERIDAN

NOTARY PUBLIC-STATE OF NEW YORK

No. 01SH6352366

Qualified In Queens County

My Commission Expires 12-27-2020

Stamp, Notary Public

FILED: NEW YORK COUNTY CLERK 08/26/2019 06:37 PM INDEX NO. 157786/2019

YSCEF DOC. NO. 128e 1:23-cr-00118-AT Document 81-21 Filed 06/05/23 Page 76 of 120 NYSCEF: 08/26/20

#### Xia Yeliang's tweets 2018 Aug - 2019 Aug



夏业良 @XiaYellang + Jul 27

Replying to @redwallpusher @wanli198964

丁佩你能说出哪段录音是伪造的吗?那些录音中郭骗和**王雁平**的声音早已被他们自己在公众场合的声音一再验证核实。你姐姐丁曼在新西兰唱中共红歌也是中宣部伪造的?

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https://twitter.com/XiaYeliang/status/1155132941909053445

Ding, pei, can you tell which recording was fabricated? The voices of Liar Guo and Wang, Yanping in those recordings have long before been verified again and again by their own voice in public occasions. Is your sister Ding, man's singing of the CCP communist songs in New Zealand also fabricated by the Publicity Department of CCP?



夏业良 @XiaYeliang - Mar 11

Replying to @TangHan32967114

郭骗在与李友的通话录音中说自己已与李友的情人上过三次床,郭骗与**王雁平**通奸的录音多达6段以上,这些证据在网上很容易就能搜索到。

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https://twitter.com/XiaYeliang/status/1105174362498441216

Liar Guo said in his recorded conversation with Li, You that he had slept with Li, You's lover for three times. There are as many as six audio recordings of Liar Guo and Wang, Yanping committing adultery. These evidences can be easily searched online.

INDEX NO. 157786/2019 COUNTY



夏业良 @XiaYellang · Mar 9

王平(王雁平?)=郭文贵?他们是什么关系?是主仆/夫妻还是情人关系?需要由 当事人签字的法律文件却由一个雇员签署,谁来承担法律责任?如18楼被抵押,郭 骗与王雁平相互推诿都不认账



唐汉 @TangHan32967114

郭夏案 郭文贵的前任律师在2019/1/17提交法庭的"王平"签 字的郭文贵的同意书:

我发誓,我已年满18岁,我有行为能力、知晓相关事...

Show this thread



C) 20

https://twitter.com/XiaYeliang/status/1104594544056778753

Wang, Ping (Wang, Yanping?) = Guo, Wengui? What kind of relationship do they have? Master and servant / husband and wife or lovers? A legal document that shall be signed by the party was signed by an employee instead. Who is going to take the legal responsibility? If 18/F is held in pledge, Liar Guo and Wang, Yanping will pass the buck and decline the responsibility.

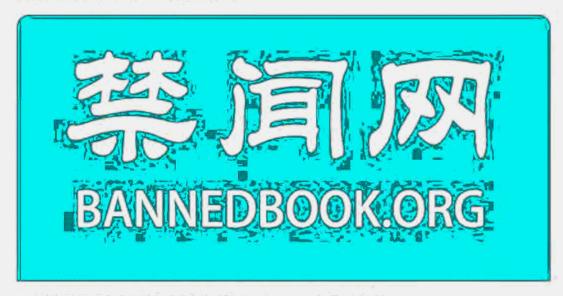
FILED: NEW YORK COUNTY CLERK 08/26/2019 06:37 PM INDEX NO. 157786/2019

YSCEF DOC. NO. Case 1:23-ci-00118-AT Document 81-21 Filed 06/05/23 Page 78 of 120 NYSCEF: 08/26/2019



夏业良 @XiaYeliang · Jan 13

对郭骗有兴趣深入了解的网友都应仔细阅读这8篇爆料文章:自称**王雁平**推特号大 爆郭文贵内幕(一) - 中国禁闻网



#### 自称王雁平推特号大爆郭文贵内幕(一) - 中国禁闻网

2017年8月17日发布 来源:王雁平 @YvetteWong0推特,文章取自网络不知 真假,旨在为读者提供多 [...]

bannedbook.org

Q 5 [] 10 © 26

https://twitter.com/XiaYeliang/status/1084659410033618944

The net fellows who are interested in the deeper knowledge of Liar Guo should read these eight exploring articles in details: a so-claimed Wang, Yanping's twitter account posed some inside information about Guo, Wengui –China Bannedbook.org



夏业良 @XiaYeliang · Jan 13

2017年6月底之后有人与我抬杠说,有关郭骗的录音都是假的,现在的技术可以合成任何人的对话,足以以假乱真。我当时挑战说:你就比照郭王录音,录一段我与 王雁平啪啪啪时对话的半小时录音,看看能否以假乱真?一年半过去了,脑残郭粉中的技术高手你们都死绝了吗?

Q 24 [] 8 () 94

Show this thread

TILED: NEW YORK COUNTY CLERK 08/26/2019 06:37 PM INDEX NO. 157786/2019

#### https://twitter.com/XiaYeliang/status/1084667925146017792

At the end of June 2017, someone came to argue with me saying the audio recording about Liar Guo was a fake, since current technology could synthesize anyone's voices in the conversation. The result would be good enough to disguise the genuine from the fake. I challenged him and said, please make a half-hour audio recording of me talking with Wang Yanping while we are having sex, then compare with Guo and Wang's recordings. Are you able to fake it as good as the real? 1.5 years has already passed, where are the idiot fans of Guo, all die out?



#### 夏业良 @XiaYeliang · Jan 13

Replying to @cruciansaint @zhao93.

吃瓜群众就不必自作多情地把自己当成郭家人了。郭骗与王雁平啪啪啪录音曝光后 那么多脑残郭粉都说是假的,结果王雁平接受明镜采访时的声音和笑声都完全相 符。郭与何频通话录音也有蠢货说是假的,你能找出第二个人能发出何总的特殊发 音与鼾声吗?蠢货们都闭嘴

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#### https://twitter.com/XiaYeliang/status/1084665987411120128

Those ordinary masses can stop imagining themselves as Guo's people. When the audio recording of Liar Guo and Wang, Yanping having sex was released, a lot of Guo's stupid fans said that was a fake. Eventually it matched perfectly with Wang Yanping's voice and laughter in her interview with Ming Jing. Some idiots also said that the audio recording of Guo and He's conversation was fake too. Can you find another person who can make that kind of special pronunciation and snoring as President He does (He Pin-Founder of Ming Jing)? Shut up idiots!



#### 夏业良 @XlaYellang - 7 Jan 2018

Replying to @hans118518 @Luzhull

你这是避重就轻,找个外星人或张三李四都毫无意义。王彦平"啪啪啪"的声音已被 大家熟知,能否以假乱真经受住大家的质疑才是重点。钱当然用不着我出,那么多 恨我的郭粉一定会让你发大财的

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#### https://twitter.com/XiaYeliang/status/950061787453575168

You are stressing the frivolous over the crux. It is meaningless to find an alien or anyone else such as Zhang, Shan or Li, Si. Wang Yanping' voice of having sex is already well familiar to the public. The main point is whether the fake one is as good as the real one and is able to stand people's questioning. Of course I don't have to pull the money out of my pocket. There are so many Guo's fans who hate me will make you rich for sure.

FILED: NEW YORK COUNTY CLERK 08/26/2019 06:37 PM
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# **EXHIBIT F**

FILED: NEW YORK COUNTY CLERK 08/26/2019 06:37 PM

NYSCEF DOC. NO. 1280 1:23-cr-00118-AT Document 81-21 Filed 06/05/23 Page 81 of 120
RECEIVED NYSCEF: 08/26/2019

#### **AFFIDAVIT**

STATE OF NEW YORK	)
	) ss
COUNTY OF QUEENS	)

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epider 08/20/2019

Sworn to before me this Monday, August 19, 2019

> Shenyi Glass Interpreter & Translator

Signature, Notary Public

FRANCIS SHERIDAN
NOTARY PUBLIC-STATE OF NEW YORK
No. 01SH6352366
Qualified In Queens County

V Commission Expires 12-27-2929

Stamp, Notary Public

ILED: NEW YORK COUNTY CLERK 08/26/2019 06:37 PM INDEX NO. 157786/2019

李洪宽 Li Hongkuan

2018年3月9日上午5:53 (2018/3/9, 5:53 a.m.)

https://twitter.com/LiHongKuan/status/971868697487921153



夏业良被郭文贵起诉书里,郭妖矢口否认睡了王雁平,更否认睡李友的情妇余丽。

我记得RPG的音频里郭文贵亲口告诉李友, 余丽和郭文贵睡了三次。

吴征也被郭文贵拉进来打官司了。 老夏有的忙了。

夏业良怎么证明王雁平和余丽被郭文贵上过了呢? 请专家帮忙出主意。



In the complaint filed by Guo, Wengui against Xia, Yeliang, Monster Guo denied that he had slept with Wang, Yanping. He also denied sleeping with Yu, Li, the mistress of Li, You.

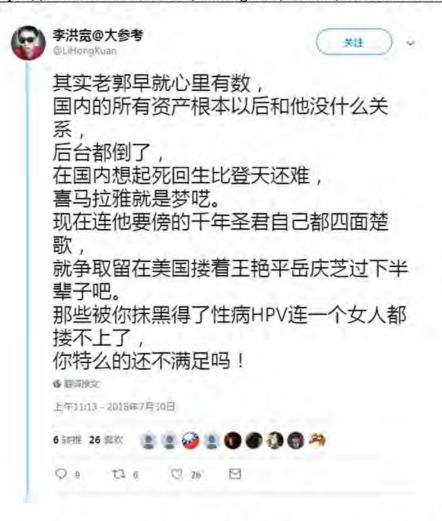
I remember in RPG's audio file in which Guo, Wengui told Li, You in person that he had slept with Yu, Li for 3 times.

Wu, Zheng is also taking into a lawsuit by Guo, Wengui. Old Xia is going to be busy now.

How could Xia, Yeliang prove that Guo Wengui has slept with Wang, Yanping and Yu, Li?

Any suggestions from experts?

2018年7月31日上午2:13 (2019/7/31, 2:13 a.m.) https://mobile.twitter.com/lihongkuan/status/1023994977620250624?s=21



Indeed Old Guo knows very well that he won't have much access to all his assets in China ever after. All his powerful connections behind the scene were collapsed. To come back in China is even harder than climbing up to the sky. Himilaya is just a dream. Now even the thousand-year sage monarch (a term used by Guo to refer to President Xi, Jinping) he is relying upon is besieged with enemies all around. Just try to fight for staying in the U.S. and spend the rest of the life with Wang, Yanping and Yue, Qingzhi. Those who were smeared black by you with HPV infection can't even be with a woman anymore. Shouldn't you be satisfied?

ILED: NEW YORK COUNTY CLERK 08/26/2019 06:37 PM INDEX NO. 157786/2019

2017年11月29日下午4:58 (2017/11/29 4:58p.m.)

twishort.com/pyGmc



Excerpts from a reader's letter: "Guo, Wengui and Wang, Yanping threatened and persecuted Ma Rui, forcing her to turn in the rape evidences." Please listen to the way how Wang, Yanping speaks and how brutal Guo, Wengui sounds. When Ma, Rui eventually left Guo, Wengui, he turned himself into a little sheep and begged. What an ugly face. I really hate myself being played by such a devil. Maybe we just want to win too much.

https://mobile.twitter.com/lihongkuan/status/1041029982179471368

FILED: NEW YORK COUNTY CLERK 08/26/2019 06:37 PM INDEX NO. 157786/2019

TYSCEF DOC. NO. 128e 1:23-cr-00118-AT Document 81-21 Filed 06/05/23 Page 85 of 120 NYSCEF: 08/26/201

https://mobile.twitter.com/lihongkuan/status/1041029982179471368





曾宏这个小弟特最近功力见长,赶超王力关锋 戚本禹郭沫若的节奏啊!

郭妖告李洪宽是否起到了惩罚群体效果呢?

郭妖和王艳萍演戏主动免除五百五是否感化了 小蚂蚁群体呢?

◎ 翻译推文

Does Guo, Wengui's legal action against Li, Hongkuan have the impact of punishing the mass? Did Monster Guo and Wang, Yanping's performance to forgive 5 million (ambiguous in the text, may be referring to money) touch the little ants?

YORK COUNTY CLERK 08/26/2019 06:37 PM Case 1:23-cr-00118-AT Document 81-21 Filed 06/05/23 INDEX NO. 157786/2019

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了说,他目无法纪观念, 名在法庭上可是至关重要的事实,一点 不能马虎。 字的地方 在法庭上没人追究则还罢了,

## #你再看看他伪造的我的签字,

作为送达传票的唯· -的所谓证据, 竟然也是伪造出来的。



下午1:31 - 2019年1月19日

1喜欢

#Guo Wengui is such a weird. To put it simply, he has no concept of law in rule. Signature is such an important detail in the court proceeding. You can't overlook its significance. Well Monster Guo directed Wang, Yanping to sign for him where he was supposed to sign. He is luck if the court doesn't look into it. Otherwise he will be exposed as a law blind! The place which should be signed by Monster Guo, he let Wang Yanping sign for him! It can be let go when no one pursues that in court, but if it is pursued, Guo Wengui will be exposed as a person who has no sense of law.

ILED: NEW YORK COUNTY CLERK 08/26/2019 06:37 PM INDEX NO. 157786/2019

#Look at my signature he fabricated. As the only so-called evidence of summon being served, it was also fabricated

#### **Bottom left picture:**

- -- Default on legal fees?
- -Guo, Wengui sues Li Hongkuan, but his consul has withdrawn from the case!
- -Wang, Yanping forged Guo's signature

#### **Bottom right picture:**

-Guo, Wengui's gang of fraud forged my signature and deceived the U.S court

2019年1月10日上午7:14 (2019/1/10 7:14a.m.)

https://mobile.twitter.com/lihongkuan/status/1083139888558624768



Monster Guo Wengui is a rogue and the worst among the worst. Little ants listened to his preaching of morality and were mesmerized by his eloquence.

He said, don't involve with friend's women, don't involve with married women. Otherwise the bad luck follows you.

Yu, Li from Peking University Founder Group is the woman of Li, You. Monster Guo had an affair with her, hadn't he?

Wang, Yanping is a wife and an old Bolsheviks party member of 18 years. He involved with her as well.

Ask a question: Karin is a woman who has a husband...

2018年11月18日下午5:20 (2018/11/185:20 p.m.) https://mobile.twitter.com/lihongkuan/status/1064086014535319552



Monster Guo is good at it.

He committed a series of fraud.

On one hand, he put on an act with Wang, Yanping, announcing that he forgive the so-called \$5 million USD unfounded lawsuit against me; at the same time he lied by saying he was working on two criminal cases against me. He is a wanted on the (Interpol's) Red Notice and not a police FILED: NEW YORK COUNTY CLERK 08/26/2019 06:37 PM

VYSCEF DOC. NO. 128e 1:23-cr-00118-AT Document 81-21 Filed 06/05/23 Page 89 of 120

RECEIVED NYSCEF: 08/26/2019

officer. What kind of authority does he have that allows him to work on criminal cases? He is just bluffing, afraid that I may run after him into the fact that he forged my signature!

2018年9月3日 上午7:33 (2018/9/3 7:33 a.m.) https://mobile.twitter.com/lihongkuan/status/1036396700653572096



Funny Proposal. Guo, Wengui suddenly announced that he cancelled / suspended \$5 million USD. (Wang, Yanping supported him in the act. She is well deserved to be called a senior party member. What a brilliant performance.) Hongkuan: Ridiculous show!

FILED: NEW YORK COUNTY CLERK 08/26/2019 06:37 PM INDEX NO. 157786/2019

UNSCREED DOC: NO. Case 1:23-cr-00118-AT Document 81-21 Filed 06/05/23 Page 90 of 120 CERT. 09/26/2010

https://mobile.twitter.com/lihongkuan/status/1033952941613481984



According to "Jin Ping Mei" (an ancient Chinese porn novel), Xi Menqing = Guo, Wengui, then Wang, Yanping = Pan, Jinlian (a female figure in the novel, who betrayed her husband and has intimate contact with Xi Menqing).

Qu, Guojiao = Li, Pinger (Xi Menqing's wife)

Yu, Yong = Meng, Yulou (Xi Menqing's wife)

Ma, Rui = Chun Mei (Xi Menqing's servant)

Zhang, Dayi = Wang, Liuer (Xi Menqing's mistress)

Yue, Qingzhi = Wu, Yuniang (A female figure in the novel)

INDEX NO. 157786/2019 COUNTY

#### 2018年7月23日上午12:29

https://mobile.twitter.com/lihongkuan/status/1021069727882412033



It is said that Monster Guo and Wang, Yanping worked closely together. It indeed looks like nobody around them. Monster Guo have learned a lot from his fellow companion Lai, Chai Yun (Founder of Monspace, involved in a pyramid scheme lawsuit). Song, Miqiu, a cult member, Guo's fan little ant is a dead mouse now (involved in a pyramid selling lawsuit). Monster Guo had learnt how Lai, Chai Yun framed Song, Miqiu. The die-hard ant gang is the time bomb next to him. The dumb ant gang is breaking up and dispersing. If those who still followed him, at some point, get crazy and create troubles in the States, this is the time for the U.S. government to punch out on Monster Guo.

TILED: NEW YORK COUNTY CLERK 08/26/2019 06:37 PM INDEX NO. 157786/2019

2018年7月10日上午1:02 (2018/7/10 1:01 a.m.) https://youtu.be/7HPqeokX40U



Monster Guo is the expert of frauds. He forged my signature recently to deceive the court. This is under investigation now.

Guo, Wengui coached Wang, Yanping and Qu, Guojiao in person on how to fabricate and deceive the court.

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回复 @renyunnijiuyun

王雁平到底是不是郭文贵的侄媳妇,这件事,郭文贵一方不愿意公开谈。官府的盗国贼一方想搞清楚,也是如探囊取物一样轻松。但是,官府也不谈。那么,这封信署名王雁平的老公不姓郭,1)是否真实?2)公开这封信对谁有利?3)会不会是郭文贵释放出来的假情报?您怎么看?

◎ 翻译推文



上午10:39 - 2018年5月7日

Is Wang, Yanping really the wife of Guo Wengui's nephew? Guo Wengui doesn't want to talk about it openly. If the corrupted government officials want to figure it out, it should be as easy as taking out the stuff from the pocket. But the government doesn't want to talk about it either. Here is the letter signed by Wang, Yanping's husband with the surname not "Guo". So, 1) Is it true? 2) Who would benefit from publishing this letter? 3) Is this the false information released by Guo, Wengui? What do you think?

Words on the picture: Another two audio clips were released, which are coming from the tapped cell phone of Wang Yanping, a fucked female assistant of Guo Wengui.

ILED: NEW YORK COUNTY CLERK 08/26/2019 06:37 PM INDEX NO. 157786/2019

2018年1月25日上午11:09 (2018/1/25 11:09 a.m.)

https://mobile.twitter.com/lihongkuan/status/956363268632858624

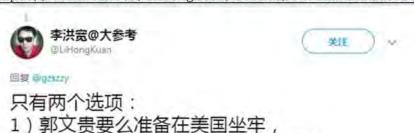


No way. My direct loss has been too much. He fucked Wang Yanping every day having fun like in the heaven. But I have no access to a woman in bed. Whenever I think of this, I want to fuck all the women in Guo, Wengui's family, meanwhile curse all of his family members died of cancer. Who allows him to spread rumors and hurt me!

TILED: NEW YORK COUNTY CLERK 08/26/2019 06:37 PM INDEX NO. 157786/2019

YSCEF DOC. NO. 1258 1:23-CT-00118-AT Document 81-21 Filed 06/05/23 Page 95 of 120
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2018年3月20日上午10:27 (2018/3/20 10:27 a.m.) https://twitter.com/LiHongKuan/status/976148235285909504



2)或准备政庇失败后被引渡回国伏法。

砸锅着力点:1)做实他强奸马蕊王雁平于泳 屈國姣等以及挪用阿中基金洗钱等刑事犯罪,

他就留在美国坐牢

2)加大力度证明他没有受到美国标准的政治 迫害,让他政庇被拒绝,让美国遣返他回到干 年圣君身边去伏法。



There are only two options:

1) Either Guo, Wengui be prepared for his jail time in the U.S.,

2) Or be prepared for the rejection of his political asylum case and extradited back to China to face China's prosecution.

To smash on the right points: 1) To further validate his criminal acts-- raped Ma, Rui, Wang, Yanping, Yu, Yong and Qu Guojiao; embezzled money from ACA Investment foundation for money laundering. So that he will sit in the US jail.

2) To strengthen the evidences to have his asylum application rejected, as he is not persecuted enough to be eligible for protection according to the US asylum protection law. Let the US government deport him back to the side of the thousand-year sage monarch (a term used by Guo to refer to President Xi) to face the law. TILED: NEW YORK COUNTY CLERK 08/26/2019 06:37 PM INDEX NO. 157786/2019 Page 96 of 120 Page 96 of 120 NYSCEF: 08/26/2019

2018年5月7日 (2018/5/7)

https://twitter.com/LiHongKuan/status/993629723736584194



If Wang, Yanping is indeed the wife of Guo, Wengui's nephew, as long as they are truly in love, it doesn't constitute the incest. If Teng, Biao and Guo, Wengui fight over it in the US court, Teng, Biao won't be in a favored position. In Guo, Wengui 's filed complaint, he mentioned "debauchery", but not "incest". It may be a tactic used by his lawyer, or it may be the taboo of Guo, Wengui. He doesn't want the word "incest" recorded in the public record. When the debate starts in the courtroom, the "incest" will inevitably become the arguable target.

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2017年12月6日上午6:55 (2017/12/6 6:55 a.m.) https://twitter.com/LiHongKuan/status/938421568622886912



Excerpts from a reader's letter: Speaking of the communication safety, privacy protection, and hackers stealing confidential info, the great volumes of the conversation recordings between Wengui and Wang, Yanping are very credible and believable. Surely they have been edited.

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### 2017年12月4日下午7:42 (2017/12/47:42 p.m.)

https://twitter.com/LiHongKuan/status/937889961365442560



Under the new China's democracy and rule of law, Rapist Guo has no way to hide. Wang, Yanping is as guilty as the rapist!

#### Guo, Wengui,

You drink good wine abroad, but default on employee's salary in China.

You ride on a yacht overseas, and rape female staff.

You perform over a painted skin in disguise, and broadcast it all over the world.

When the democratic constitution comes up in new China, the assets of the CCP will be audited, as well as yours, Guo, wengui.

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# **EXHIBIT G**

FILED: NEW YORK COUNTY CLERK 08/26/2019 06:37 PM

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NYSCEF DOC. NO. 120 NYSCEF: 08/26/2019

#### **AFFIDAVIT**

STATE OF NEW YORK )
) ss:
COUNTY OF QUEENS )

I, Shenyi Glass, am a linguist hired by TransPerfect, a translation services that operates under both ISO 9001:2008 and EN 15038:2006 certification. I have been speaking Chinese dialect of Mandarin for 50 years. I am a recipient of the Certificates for the New York State Court Interpreter and the National Healthcare Interpreter. I have studied the Chinese translation for 5 years.

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The Attached Social Media Posts

TransPerfect Translations, Inc., a translation organization with over 90 offices on six continents, is a leader in professional translations. TransPerfect Translations, Inc. has over twenty years experience translating into the above language pair, its work being accepted by business organizations, governmental authorities and courts throughout the United States and internationally.

TransPerfect Translations, Inc. affirms that the provided translation was produced in according to our ISO 9001:2015 and ISO 17100:2015 certified quality management system, and also that the agents responsible for said translation(s) are qualified to translate and review documents for the above language pair, and are not a relation to any of the parties named in the source document(s).

hopelen 08/20/2019

Sworn to before me this Monday, August 19, 2019

Interpreter & Translator

Signature, Notary Public

FRANCIS SHERIDAN NOTARY PUBLIC-STATE OF NEW YORK No. 01SH6352366

Stamp, Notary Public Commission Expires 12-27-2020

FILED: NEW YORK COUNTY CLERK 08/26/2019 06:37 PM

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NYSCEF DOC. NO. 157786/2019

RECEIVED NYSCEF: 08/26/2019

#### Li Hongkuan's tweets 2018 Aug-2019 Aug



https://twitter.com/LiHongKuan/status/1127869008861126656

Wang, Yanping, you old Bolshevik, how did you sneak into the New York of the United States and get onto the bed? Be honest and confess.

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李洪宽@大参考 @LiHongKuan - Apr 27



https://twitter.com/LiHongKuan/status/1122390178797170688

The player may get lost in the game. Wang, Yanping is now facing the most difficult choices. She may not be able to make the best judgment and assessment over her current situations.

The magnitude of Wang, Yanping's sense of law now will decide how she can protect herself of her interests and her criminal liability by the time of the imminent perishing of Monster Guo.



https://twitter.com/LiHongKuan/status/1104847082660216835

Please pay attention to the fact that Monster Guo and Wang, Yanping have published a series of articles in which they intentionally did not clarify the key information regarding the death of Wu, Yuexiang (Guo's mother).

- 1) Detailed hospital name where she deceased.
- 2) The year she deceased. Is it 2017 or 2019?

This is to plant the seed for the future "strategic lie".

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https://twitter.com/LiHongKuan/status/1104829423700901888

Currently, the Guo's household was still ruled by Yanpin. Sara is the assistant. Karin serves at the bedtime.

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https://twitter.com/LiHongKuan/status/1086738009100308480

#Guo, Wengui is such a weird. To put it simply, he has no concept of law in rule. Signature is such an important detail in the court proceeding. You can't overlook its significance. Well Monster Guo directed Wang, Yanping to sign for him where he was supposed to sign. He is luck if the court doesn't look into it. Otherwise he will be exposed as a law blind! #Look at my signature he fabricated. As the only so-called evidence of summon being served, it was also fabricated.

#### **Bottom left picture:**

- -Default on legal fees?
- -Guo, Wengui sues Li, Hongkuan, but his consul has withdrawn from the case!
- -Wang, Yanping forged Guo's signature.

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#### **Bottom right picture:**

-Guo, Wengui's gang of fraud forged my signature and deceived the U.S court.



https://twitter.com/LiHongKuan/status/1083139888558624768

Monster Guo Wengui is a rogue and the worst among the worst. Little ants listened to his preaching of morality and were mesmerized by his eloquence.

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He said, don't involve with the friend's women, don't involve with the married women. Otherwise the bad luck follows you.

Yu, Li from Peking University Founder Group is the woman of Li, You. Monster Guo had an affair with her, hadn't he?

Wang, Yanping is a wife and an old Bolsheviks party member of 18 years. He involved with her as well.

Ask a question: Karin is a woman who has a husband...



#### 李洪宽@大参考 @LiHongKuan - 16 Dec 2018

Replying to @magic201804 @Hua\_Po\_Po

刘延平功劳大大地,是他安排策反了张志伟,偷走了郭文贵一百多盘录音存档数据,让我们得以听到了郭文贵王**雁平**啪啪啪的,甚至爆菊的现场实况录音。

Q1 th 01

https://twitter.com/LiHongKuan/status/1074230351432728581

Liu, Yanping's contribution to the success of the work is tremendous. He arranged to motivate Zhang, Zhiwei to steal more than a hundred of the tape recording data files. Thus we can hear Guo, Wengui and Wang, Yanping having sex, even the live audio of them having anal sex.



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#### https://twitter.com/LiHongKuan/status/1071455555670212608

Guo, Wengui is insane and sick psychologically. He is more autocratic than the CCP with zero tolerance for the criticism. He is untouchable just like the ass of a tiger. Guess he was often fucked by the old rich women through his anus in the past, so he probably has grown some enjoyment for anal sex. Every time when he has sex with Wang, Yanping, he will thrust into her anus. And he mentions anal hemorrhoids every day.



https://twitter.com/LiHongKuan/status/1064086014535319552

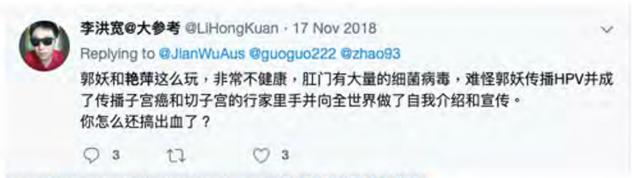
Guo, Wengui is good at it. He committed a series of fraud. FILED: NEW YORK COUNTY CLERK 08/26/2019 06:37 PM INDEX NO. 157786/2019

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On one hand, he put on an act with Wang, Yanping, announcing that he forgive the so-called \$5 million USD unfounded lawsuit against me; at the same time he lied by saying he was working on two criminal cases against me. He is a wanted on the (Interpol's) Red Notice and not a police officer. What kind of authority does he have that allows him to work on criminal cases? He is just bluffing, afraid I may run after him into the fact that he has forged my signature!



https://twitter.com/LiHongKuan/status/1064039704650293248

It is very unhealthy for Monster Guo and Yanping to have fun in this way. There are a lot of bacteria and virus around the anus. No wonder Monster Guo transmitted HPV around and becomes an expert in publicizing uterus cancer and hysterectomy. He also makes self-introduction and promotion about it to the whole world. How come you made it bleeding?

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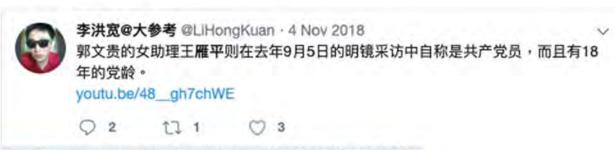
https://twitter.com/LiHongKuan/status/1061801253666258944

It is said that Wang, Yanping appeared in a video of Monster Guo meeting with Bannon released two days ago.

The female witches in Monster Guo's gang are not the ordinary women, including the female fans of Guo who were then kicked out by him. An ordinary woman won't have such tenacity. Doubtlessly the CCP member Yan is among the witches.

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https://twitter.com/LiHongKuan/status/1059330308661829633

Wang, Yanping, the female assistant of Guo, Wengui, in the interview with Mingjing on Sep 5th last year, claimed that she is a communist with 18 years of membership.



https://twitter.com/LiHongKuan/status/1048677260969107456

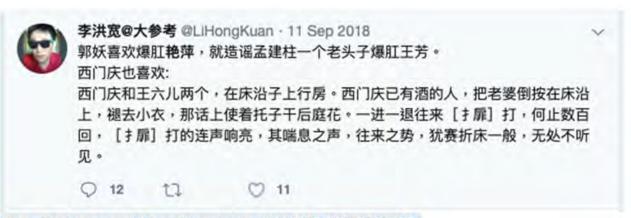
Only a penis can shoot so many "bullets". Wengui's "gun" probably had been powerless long before. Since Qu, Guoqiao is infected with HPV, his penis should have been infected with virus too. I guess he has already become incompetence. Someone told me the anal fissure/ bleeding with Wang, Yanping was just a show. He knows that there is a special Task Force monitoring him on 24/7.

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https://twitter.com/LiHongKuan/status/1039427786866405376

Monster Guo likes to have anal fissure with Yanping, so he spread the rumors that an old man Meng, Jianzhu had anal sex with Wang, Fang.

Xi Menqing (a character in an ancient Chinese porn novel) also likes it: (The description of Xi Menqing having anal sex with a woman)



https://twitter.com/LiHongKuan/status/1038563082870685701

Fucking Monster Guo and Wang, Yanping improvised a performance and deceived some "little ants", but a few fans of Monster Guo didn't get it.

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## https://twitter.com/LiHongKuan/status/1037735643185639425

As the best actor Guo, Wengui and the best supporting actress Wang, Yanping, when are you guys also coming to put on another ridiculous show to forgive Chen, Jung's 5million dollars?

Funny Proposal. Guo, Wengui suddenly announced that he cancelled / suspended \$5 million USD. (Wang, Yanping supported him in the act. She is well deserved to be called a senior party member. What a brilliant performance.) Hongkuan: Ridiculous show!



https://twitter.com/LiHongKuan/status/1033952941613481984

According to "Jin Ping Mei" (an ancient Chinese porn novel), Xi Menqing = Guo, Wengui, then Wang, Yanping = Pan, Jinlian (a female figure in the novel, who betrayed her husband and has intimate contact with Xi Menqing).

Qu, Guojiao = Li, Pinger (Xi Menqing's wife)

Yu, Yong = Meng, Yulou (Xi Menqing's wife)

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Ma, Rui = Chun Mei (Xi Menqing's servant)
Zhang, Dayi = Wang, Liuer (Xi Menqing's mistress)
Yue, Qingzhi = Wu, Yuniang (A female figure in the novel)



https://twitter.com/Enforgham/Status/2000213001/3001/

Monster Guo was born in 1967, the year of sheep. Yue was born in 1968, the year of monkey.

Monster Guo and Qu, Guojiao who is from Hong Kong had given birth to a baby. The audio and video recordings of him having anal sex with the old party member Wang, Yanping are spreading every day all over the world. Yet he still shamelessly boasts that he loves his wife.



https://twitter.com/LiHongKuan/status/1028304382574690306

To presiding over these issues, Wang, Yanping and those involved must testify in the court as witnesses. Otherwise, the judge can hardly make the judgment. At the moment, the first thing among the first is that the government must submit the semen stain that Ma, Rui possessed, file the case in New York and arrest Guo, Wengui. It is a criminal case.

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https://twitter.com/LiHongKuan/status/1027428874886496256

No way, how can I compete with him in having sex. He could hold Yanping on the left side, thrusting into her anus, then turned around and held Qing Zhi in his right arm...

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# **EXHIBIT H**

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#### **AFFIDAVIT**

STATE OF NEW YORK ) ss: COUNTY OF QUEENS )

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hepiden 08/2019

Sworn to before me this Monday, August 19, 2019

Shenyi Glass

Signature, Notary Public

FRANCIS SHERIDAN

NOTARY PUBLIC-STATE OF NEW YORK

No. 01SH6352366

Qualified In Queens County

My Commission Expires 12-27-2020

Stamp, Notary Public

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### 黄河边 Huang Hebian

王雁平之谜 黄河边

The mystery of Wang, Yanping - by Huang Hebian

https://youtu.be/8ziqwwmHYDQ

郭文贵有一个心腹女将,十月底,应该是十月底离开他了。

我所说的郭文贵这个疑似离开的心腹,她的名字叫王雁平。

Guo, Wengui has a female confidant as his assistant. At the end of October, yes, it was the end of the October when she might have left him. This confidant of Guo, Wengui I mentioned here is named Wang Yanping.

#### 一、出租公寓案证词矛盾

郭文贵的证言是这么说的,他说,都是王雁平告诉我的,之前我一概不知。

王雁平是是这么说的,我从来没有告诉过郭文贵,因为我根本不知情。

Inconsistency of the testimony on the case of the apartment lease Here is Guo, Wengui's testimony. He said, I did not know anything at all until Wang, Yanping told me all of it.

Here is Wang, Yanping's testimony: I have never told Guo Wengui anything simply because I don't know anything.

#### 二、王雁平不再是郭文贵管家身份

王雁平在十月份之前所有的法庭文件当中,都是以郭文贵的管家身份出现的。

十月份之后,尤其是十月份中旬之后,王雁平的名字就再也没有出现过了。

Wang, Yanping is no longer the steward in Guo, Wengui's household.

Prior to October, Wang Yanping was identified as Guo, Wengui's steward in all the court papers.

After October, especially after mid-October, Wang, Yanping's name has never appeared again.

#### 三、王雁平不再是郭宝胜案证人

郭宝胜这个案子当中,郭文贵告郭宝胜,说诈骗 4.2 万元,几乎所有的费用都是通过王雁平给的。

所以王雁平是这 4.2 万元中的最重要的付款证人。但是在郭文贵相关的法律文书当中,王 雁平没有以证人的身份出现。

Wang, Yanping is no longer the witness in Guo, Baosheng case

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In Guo, Baosheng's case, Guo, Wengui sued Guo Baosheng, alleging that Guo, Baosheng defrauded him of \$42,000, and that almost all the money/fees were given via Wang Yanping.

So, Wang, Yanping is the most critical witness as a payer in this \$42,000 lawsuit. However, Wang Yanping's name didn't appear as a witness in the court papers Guo, Weigui submitted.

四、记者会不见王雁平

在这一次原来是记者会,后来是说明会,这个闹剧当中,王雁平的戏份几乎是不存在的。

面对怀疑,文贵又开始演戏了

郭文贵这戏演的有点儿过,按照正常的惯例,他问了几次之后,对方应该有些微的回声,哪怕是吱一声都有,结果,我们屏息静声地去听,一点儿声音都没有,连个走动的声音都 没有。文贵呀,演砸了呀。

王雁平去向成谜 相信看清了郭文贵的真面目 是不会再有人追随郭文贵的 王雁平也不例外

Wang Yanping is nowhere to be seen in the press conference.

This was supposed to be a press conference. Later it became a briefing conference. In this farcical show, Wang, Yanping's face was scarcely seen.

Facing all the suspicious, Guo, Wengui started his performance again.

This time he was a little overacting. According to the normal practice, after he asked for a few times, there should have some sort of responses, even if it is just a sound of "oh". Yet, we held our breath and listened. No, no sound at all, not even a sound of moving around. Wengui, you screwed the show!

Wang, Yanping's whereabouts become a mystery.
It is believed that when the true face of Guo, Wengui is clearly seen,
No one would continue following him.
Wang Yanping is no exception.

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# https://twitter.com/huanghebian/status/1127677763677110272



唐汉兄今天发的这一帖非常有意思,对于郭骗 子这位女秘书有家不能回有子不能认有夫不能 抱的境遇,我有一点淡淡的同情。但她在法庭 上大谈忠诚及断言网上她与人叭叭叭的音频全 是别人伪造,这就胡扯了。别说早有人拿去技 术鉴定为真, 那声音谁都听出来了, 造假厂 为零。不然,重金拜托你整个我的同类音频?



The post that Brother Tanghan published today is very interesting. I have a bit of sympathy toward Cheater Guo's female secretary, for her inability to go back home, to see her child and hug her husband. Yet, it is bullshit that she talked about loyalty in the court and asserted that the audio files on the Internet of her having sex were fabricated. The voice is recognizable by anyone. There is zero chance of fabrication, not to mention they were sent out for a technical verification long time ago and their authenticity is determined. Or what about I give you some big money and you please fabricate a genuine audio file of me?